### EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 5 DOCKET NO.: 2010-1300-AIR-E TCEQ ID: RN102457520 CASE NO.: 40180 RESPONDENT NAME: TOTAL PETROCHEMICALS USA, INC.

ORDER TYPE:							
X_1660 AGREED ORDER	FINDINGS AGREED ORDER	_FINDINGS ORDER FOLLOWING SOAH HEARING					
_FINDINGS DEFAULT ORDER	_FINDINGS DEFAULT ORDERSHUTDOWN ORDER						
_AMENDED ORDEREMERGENCY ORDER							
CASE TYPE:							
<u>X</u> AIR	MULTI-MEDIA (check all that apply)	INDUSTRIAL AND HAZARDOUS WASTE					
PUBLIC WATER SUPPLY	PETROLEUM STORAGE TANKS	_OCCUPATIONAL CERTIFICATION					
WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL					
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION					
SITE WHERE VIOLATION(S) OCCURRED: TOTAL PETRO CHEMICALS USA PORT ARTHUR REFINERY, 7600 32nd Street, Port Arthur, Jefferson County  TYPE OF OPERATION: Petrochemical plant  SMALL BUSINESS: YesXNo  OTHER SIGNIFICANT MATTERS: There are no complaints. There are two additional pending enforcement actions regarding this facility location, Docket Nos. 2009-0131-AIR-E and 2011-0260-AIR-E.  INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.  COMMENTS RECEIVED: The Texas Register comment period expired on March 28, 2011. No comments were received.  CONTACTS AND MAILING LIST:  TCEQ Attorney/SEP Coordinator: Mr. Phillip Hampsten, SEP Coordinator, Enforcement Division, MC 219, (512) 239-6732  TCEQ Enforcement Coordinator: Ms. Andra Benoit, Enforcement Division, Enforcement Team 5, MC R-10, (409) 899-8799; Ms. Laurie Eaves, Enforcement Division, MC 219, (512) 239-4495  Respondent: Mr. Darrell Jacob, Refinery Manager, TOTAL PETROCHEMICALS USA, INC., 7600 32nd Street, Port Arthur, Texas 77642  Respondent's Attorney: Not represented by counsel on this enforcement matter							

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to ensure a quicker response time for

periods of elevated emissions rates for

### **RESPONDENT NAME:** TOTAL PETROCHEMICALS USA. INC. DOCKET NO.: 2010-1300-AIR-E

#### VIOLATION SUMMARY CHART:

#### VIOLATION INFORMATION PENALTY CONSIDERATIONS CORRECTIVE ACTIONS TAKEN/REQUIRED Type of Investigation: Total Assessed: \$213,972 Corrective Actions Taken: \_\_ Complaint Routine Total Deferred: \$42,794 The Executive Director recognizes that Enforcement Follow-up X Expedited Settlement the Respondent has implemented the X Records Review following corrective measures at the Financial Inability to Pay Plant: Date(s) of Complaints Relating to this Case: None SEP Conditional Offset: \$85, 589 a. Replaced a faulty combustible sensor, physically isolated purge gas, Total Paid to General Revenue: locked and tagged out the control Date of Investigation Relating to valve, and trained personnel in the this Case: June 14, 2010 and May 27, \$85,589 modification process flow to prevent 2010 Compliance History Classifications: exceedances of the permitted hourly emissions rates for CO, NOx, and SO2 Date of NOV/NOE Relating to this Person/CN - Average Case: July 26, 2010 and August 6, Site/RN - Average on February 5, 2010; 2010 (NOE) Major Source: X Yes \_\_ No b. Modified operating instructions Background Facts: This was a indicating proper control during records review. Applicable Penalty Policy: September periods of black burn in order to maintain the proper temperature at 2002 AIR the chlorosorb inlet on June 17, 2010; c. In response to Incident No. 139159, 1) Failed to comply with the allowable hourly emissions rates. Specifically, repaired the faulty flow meter and from January 1, 2009 through trained personnel on June 23, 2010; December 31, 2009, the Respondent exceeded the authorized hourly d. Submitted an administratively emissions rates for 12 heaters, complete permit application on August resulting in the release of 70.6 pounds 2, 2010, to amend the current Air ("lbs") of sulfur dioxide ("SO2") [30 Permit Nos. 46396 and PSD-TX-1073, TEX. ADMIN. CODE §§ 101.20(3), to incorporate Air Permit Nos. 5694A, 116.115(b), (b)(2)(F) and (c), and 18936 and PSD-TX-762M2, 56386, 122.143(4), TEX. HEALTH & SAFETY CODE and 56409, in order to raise the § 382.085(b), Federal Operating maximum allowable rates for VOCs, Permit ("FOP") O-01267, Special authorize Tank 586 for its current Terms and Conditions ("STC") 28, Air service of Pyrolysis Fuel Oil/Pyrolysis Gas Oil, and raise the throughput rates Permit Nos. 2347, 8983A, 9194A and PSD-TX-453M6, 9195A and PSD-TXat Docks 1 and 3; 453M6, SC 1, Air Permit Nos. 3615 and 5694, General Conditions ("GC") 8, e. Trained personnel on the and Air Permit Nos. 9193A and PSDenvironmental permit emissions rates TX-453M6, Special Conditions ("SC") and alarm points that operations use to prevent SO2 emissions rates 2]. exceedances at the heaters on 2) Failed to comply with the allowable September 2, 2010; hourly emissions rates. Specifically, from January 29, 2009 to March 10, f. Trained personnel on environmental permit emissions rates at the Sulfur 2009, on July 7, 2009 and on November 3, 2009, the Respondent Recovery Unit Incinerator and alarm exceeded the authorized hourly points that operations use to prevent emissions rates at Emissions Point CO, H2S, and SO2 emissions rates Number ("EPN") 17REFHTRS of 15.75 exceedances on September 2, 2010; pounds per hour ("lbs/hr") for carbon monoxide ("CO") and 14.85 lbs/hr for g. Created and modified alarm points

nitrogen oxide ("NOx"), resulting in the release of 588.45 lbs of CO and 2.16

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lbs of NOx [30 Tex. Admin. Code §§ 116.115(b), (b)(2)(F) and (c), 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, Air Permit No. 5694A, GC 8].

- 3) Failed to comply with the allowable hourly emissions rates and concentrations. Specifically, the Respondent exceeded the authorized hourly emission rate of 77.26 lbs/hr of CO and the NOx concentrations of 42 parts per million ("ppm") at EPN 60COGENSTK on January 28, 2009, February 6, 2009, August 12, 2009 through August 17, 2009, December 7, 15 and 16, 2009, resulting in the release of 182.77 lbs of CO and the average concentration of 88.70 ppm of NOx [30 Tex. Admin. Code §§ 101.20(3), 116.115(b), (b)(2)(F) and (c), 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP O-01267, STC 28, and Air Permit Nos. 16840 and PSD-TX-688M2, SC 2 and GC 8].
- 4) Failed to comply with the allowable hourly emissions rates. Specifically, on February 5 and 16, 2009, during daily monitoring of the carbon canister breakthrough the Respondent exceeded the authorized hourly emissions rate of 0.01 lbs/hr of volatile organic compounds ("VOCs") at EPN 67TNK0660CC resulting in the release of 0.96 lbs of VOCs for 48 hours [30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, and Air Permit No. 56385, SC 1].
- 5) Failed to comply with the allowable hourly emissions rates and concentrations. Specifically, on May 9, 2009 to November 20, 2009, the Respondent exceeded the hourly emissions rate of 40.37 lbs/hr of CO, 1.06 lbs/hr of H2S, and 37.88 lbs/hr of SO2 at the Sulfur Recovery Tail Gas Thermal Oxidizer, EPN 15RUINCIN, resulting in the release of 254.1 lbs of CO, 2.39 lbs of hydrogen sulfide ("H2S"), 87.5 lbs of SO2, and the average SO2 concentration of 602 ppm [30 Tex. ADMIN. CODE §§ 101.20(1) and (3), 116.115(b)(2)(F) and (c), and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 60.104(a)(2)(i) and 60.105(e)(4)(i), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP O-01267, STC 28, Air Permit Nos. 9195A and PSD-TX-453M6, SC 1 and 3].

CO and NOx concentrations on September 8, 2010; and

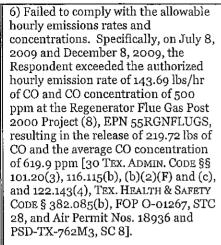
h. Revised operating procedures to emphasize the importance of managing CO burn at the Regenerator Flue Gas Post 2000 Post (8) on September 9, 2010.

#### Ordering Provisions:

- 1) The Order will require the Respondent to implement and complete a Supplemental Environmental Project ("SEP"). (See SEP Attachment A)
- 2) The Order will also require the Respondent to:
- a. Within 30 days after the date of this Agreed Order, initiate an engineering study to evaluate the carbon canister system operation, and implement measures designed to control VOC hourly and annual emissions rates exceedances;
- b. Within 45 days after the effective date of this Agreed Order, submit certification of compliance for Ordering Provision 2.a.;
- c. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the permit application for Air Permit Nos. 46396 and PSD-TX-1073 within 30 days after the date of such requests, or by other deadline specified in writing; and
- d. Within 180 days after the effective date of this Agreed Order, submit written certification that either proper authorization has been obtained and the changes are sufficient to demonstrate compliance with the violations addressed or that operation has ceased until such time that appropriate authorization is obtained.

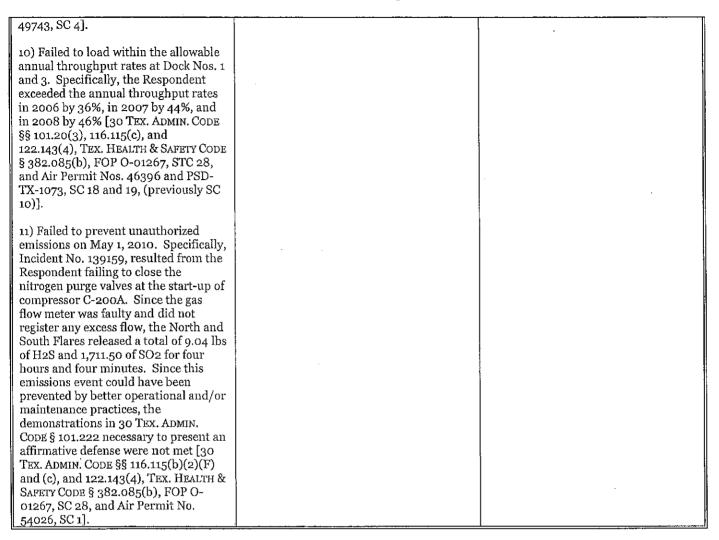
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DOCKET NO.: 2010-1300-AIR-E



- 7) Failed to maintain the proper temperature at the chlorosorb inlet. Specifically, the maximum temperature of 366.6 degrees Fahrenheit was exceeded in the chlorosorb inlet by 4.05 degrees Fahrenheit on September 15, 2009, and 1.72 degrees Fahrenheit on September 13, 2009 [30 Tex. ADMIN. CODE §§ 113.780, 116.115(c), and 122.143(4), 40 CFR § 63.1567(a)(2), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, and Air Permit No. 5694A, SC 3].
- 8) Failed to comply with the annual allowable emission rates. Specifically, from January 1, 2008 to December 31, 2008, the Respondent exceeded the authorized annual VOC emissions rate by a total of 9.2 tons per year ("tpy") for 14 tanks. From January 1, 2009 through December 31, 2009, the Respondent exceeded the authorized annual VOC emissions rate by a total of 11.1 tpy for 14 tanks [30 Tex, ADMIN. CODE §§ 106.6, 116.115(b) and (b)(2)(F), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP O-01267, STC 28, Air Permit Nos. 5694A and 18936 and PSD-TX-762M2, GC 8, Air Permit Nos. 46396 and PSD-TX-1073, 56385, and 56409, SC 1].
- 9) Failed to authorize Tank 586, EPN 22TANK0586, for current service. Specifically, for the period of July 1, 2009 through September 30, 2009, Tank 586 was authorized for Asphalt/Asphalt Blendstock, but not authorized for its current service of Pyrolysis Fuel Oil/Pyrolysis Gas Oil [30 Tex. Admin. Code §§ 116.110(a), 116.115(c) and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28 and Air Permit No.

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Additional ID No(s).: Air Account JE0005H

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## Attachment A Docket Number: 2010-1300-AIR-E

#### SUPPLEMENTAL ENVIRONMENTAL PROJECT

The Respondent:

TOTAL PETROCHEMICALS USA, INC.

**Penalty Amount:** 

One Hundred Seventy-One Thousand One Hundred

Seventy-Eight Dollars (\$171,178)

**SEP Offset Amount:** 

**Eighty-Five Thousand Five Hundred Eighty-Nine** 

Dollars (\$85,589)

Type of SEP:

Pre-approved SEP

Third-Party Recipient:

Southeast Texas Regional Planning Commission

**Project Name:** 

Meteorological and Air Monitoring Network

Location of SEP:

**Jefferson County** 

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative penalty amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP offset amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

### 1. Project Description

#### a. Project

The Respondent shall contribute the SEP offset amount to the Third-Party Recipient named above. The contribution will be to the **Southeast Texas Regional Planning Commission** to be used for the *Meteorological and Air Monitoring Network* as set forth in an agreement between the Third-Party Recipient and the TCEQ. Specifically, the contribution will be used to operate, maintain, and potentially expand the existing Southeast Texas Regional Air Monitoring Network which includes nine monitoring stations currently at the following locations:

- 1. Beaumont CAM#2
- 2. Cove School CAM #C695
- 3. Mauriceville CAM#642
- 4. Port Arthur (Motiva) Industrial Site CAM #C628
- 5. Port Arthur Memorial High School campus CAM #C689
- 6. Port Neches CAM #136
- 7. Sabine Pass CAM #C640
- 8. Southeast Texas Regional Airport CAM #C643
- 9. West Orange CAM #C9

The pollutants currently monitored at each station are identified in Table 1.1 of the agreement between the Third-Party Recipient and the TCEQ. Additional parameters or monitoring sites may, contingent upon available funding and approval of TCEQ, be Page 1 of 4

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added. Operation and maintenance of the ambient air monitoring stations includes canister sampling and gas chromatographs. Ancillary equipment includes sample conditioning systems, meteorological towers, climate controlled equipment shelters, a remote communications system, and electronic data logging capability. Ambient monitoring protocols have been and will continue to conform to applicable TCEQ or U.S. Environmental Protection Agency guidelines.

A TCEQ-approved Quality Assurance Project Plan containing all applicable EPA QA-R5 elements shall be maintained. Analysis of all data collected from these sites will comply with Standard Operating Procedures for the analysis and measurement of Volatile Organic Compounds in Ambient Air. The laboratory data generated by this project will be from a TCEQ accredited laboratory in compliance with state laws and rules regarding use of certified or accredited testing laboratories. For example, the Third-Party Recipient must comply with 30 Texas Administrative Code, Chapter 25, Subchapter A, relating to Environmental Testing Laboratory Accreditation and Certification, as amended.

The SEP Offset Amount will be used to purchase equipment (such as automated canister samplers), hardware, software, and licenses to enable the monitoring, and for the cost of operating, maintaining, and periodically upgrading or adding to these air monitoring stations along with ancillary equipment approved by TCEQ. The data will be validated and sent to TCEQ's Leading Environmental Analysis and Display (LEADS) system. All costs associated with the collection, transfer, and formatting of these data to be compatible with the LEADS system is the responsibility of the Third-Party Recipient. No portion of the SEP Offset Amount will be used for administrative costs or salaries of the Third-Party Recipient. The Third-Party Recipient may use contractors to perform the monitoring project, subject to special conditions concerning costs.

The project will be administered in accordance with federal, state, and local environmental laws and regulations. The Respondent certifies that there is no prior commitment to make this contribution and that it is being performed solely in an effort to settle this enforcement action.

#### b. Environmental Benefit

Particulate matter (PM), sulfides (SO, SO2), oxides of nitrogen (NOx), volatile organic carbon (VOC) compounds, and ambient air conditions are measured at the stations and the data are made accessible to TCEQ and the public. Sites may also provide continuous assessment of benzene, 1, 3-butadiene and styrene. This monitoring was not previously covered by existing ambient air monitoring systems. The data is shared with the Texas Commission on Environmental Quality, industry, and the public at <a href="http://www.tceq.state.tx.us/cgi-bin/compliance/monops/site">http://www.tceq.state.tx.us/cgi-bin/compliance/monops/site</a> info.pl.

Continued monitoring in this area of the community will help better understand air quality pollutants and will enable better identification of emission sources. The data will focus on specific chemicals that may raise air quality concerns.

#### c. Minimum Expenditure

The Respondent shall contribute at least the SEP offset amount to the Third-Party Recipient and comply with all other provisions of this SEP.

#### 2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent shall contribute the SEP offset amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

Southeast Texas Regional Planning Commission Bob Dickinson, Director Transportation and Environmental Resources Attention: SEP South East Texas Regional Planning Commission 2210 Eastex Freeway, Beaumont, TX 77703

#### 3. Records and Reporting

Concurrent with the payment of the SEP offset amount, the Respondent shall provide the Enforcement Division SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP offset amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division Attention: SEP Coordinator, MC 219 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

#### 4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP offset amount.

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TOTAL PETROCHEMICALS USA, INC. Agreed Order – Attachment A

In the event of incomplete performance, the Respondent shall submit a check for any remaining amount due made payable to "Texas Commission on Environmental Quality" with the notation "SEP Refund" and the docket number of the case, and shall send it to:

Litigation Division Attention: SEP Coordinator, MC 175 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

#### 5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

#### 6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

#### 7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

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# Penalty Calculation Worksheet (PCW)

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Respondent TOTAL PETROCHEMICALS USA, INC.

Case ID No. 40180

Reg. Ent. Reference No. RN102457520

Media [Statute] Air

Enf. Coordinator Audra Benoit

Policy Revision 2 (September 2002) PCW Revision October 30, 2008

### Compliance History Worksheet >> Compliance History Site Enhancement (Subtotal 2)

Component	Number of	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	13	65%
	Other written NOVs	18	36%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	12	240%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	2	50%
Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)		0%
Decrees	Any adjudicated final court judgments and default judgments, or non- adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0 .	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		-3%
Audics	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)		-2%
		ease Enter Yes or No	
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No !	0%
	Early compliance with, or offer of a product that meets future state or federa government environmental requirements	No	0%

Compliance History Notes Enhancement for 13 same/similar NOVs, 18 dissimilar NOVs, 12 orders with a denial of liability, and two orders without a denial of liability. Reduction for three notices of intended audits and one disclosure of violation.

Total Adjustment Percentage (Subtotals 2, 3, & 7)

<u>386%</u>

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Media [Statute] Air Enf. Coordinator Audra Benol		
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	Permit Nos. 9193A and PSD-TX-453M6, SC 2	
Violation Description January authorized	comply with the allowable hourly emissions rates. Specific 1, 2009 through December 31, 2009, the Respondent exce hourly emissions rates for 12 heaters, resulting in the rele bounds ("lbs") of sulfur dioxide ("SO2"). See Attachment	eeded the case of 70.6
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	I/A     (mark with x)  The Respondent completed corrective actions for this	s. I
No.	tes violation on September 2, 2010, after the July 26, 20 NOE	
The state of the s	Violat	tion Subtotal \$2,250
Economic Benefit (EB) for this viola	ition Statutory ⊑ii	mit Test
Estimated EB Amo	MICHAEL MARCHAEL CONTROL CONTR	
	This violation Final Assessed Penalty (adjuste	-
	The frontier i mar Assessed r charty (adjuste	

Ttem Description No  Delayed Costs  Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)	)180 )102457520 r 	Date Required	Final Date	0:00	\$02 \$02 \$03 \$03 \$04 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05	Percent Interest 5.0 Onetime Costs \$0 \$0 \$0 \$0 \$0 \$0 n/a n/a n/a	Years of Depreciation 15 EB Amount \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Case ID No. 40 Reg. Ent. Reference No. RN Media Air Violation No. 1  Item Description No. Delayed Costs Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	180 102457520 Item Cost commas or \$	Date Required	Final Date	0:00 0:00 0:00 0:00 0:00 0:00 0:00 0:0	\$02 \$02 \$03 \$03 \$04 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05	\$0 \$0 \$0 \$0 \$0 \$0 \$0 n/a n/a	Depreciation 15 EB Amount
Media Alr Violation No. 1  Item Description No Delayed Costs Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	tem Cost. o commas or \$	Date Required		0:00 0:00 0:00 0:00 0:00 0:00 0:00 0:0	\$02 \$02 \$03 \$03 \$04 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05	\$0 \$0 \$0 \$0 \$0 \$0 \$0 n/a n/a	Depreciation 15 EB Amount
Ttem Description No. 1  Ttem Description No. 1  Delayed Costs Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	Item Cost commas or \$			0:00 0:00 0:00 0:00 0:00 0:00 0:00 0:0	\$02 \$02 \$03 \$03 \$04 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05	\$0 \$0 \$0 \$0 \$0 \$0 \$0 n/a n/a	Depreciation 15 EB Amount
Item Description: No  Delayed Costs  Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	o commas or \$			0:00 0:00 0:00 0:00 0:00 0:00 0:00 0:0	\$02 \$02 \$03 \$03 \$04 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05	\$0 \$0 \$0 \$0 \$0 \$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Item Description No  Delayed Costs Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	o commas or \$			0:00 0:00 0:00 0:00 0:00 0:00 0:00 0:0	\$02 \$02 \$03 \$03 \$04 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Item Description No  Delayed Costs Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	o commas or \$			0:00 0:00 0:00 0:00 0:00 0:00 0:00 0:0	\$02 \$02 \$03 \$03 \$04 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Item Description No  Delayed Costs Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	o commas or \$			0:00 0:00 0:00 0:00 0:00 0:00 0:00 0:0	\$02 \$02 \$03 \$03 \$04 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05 \$05	\$0 \$0 \$0 \$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Delayed Costs Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs				0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS				0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Equipment Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDed Costs				0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Buildings Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS				0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS				0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	.\$0 \$0 n/a n/a	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS				0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 n/a n/a n/a	\$0 \$0 \$0 \$0 \$0
Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS				0.00 0.00 0.00	\$0 \$0 \$0 \$0	n/a n/a n/a	\$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS				0.00	\$0 \$0	n/a n/a	\$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS			en gertek	0.00	* \$0	NAME AND ADDRESS OF THE PERSON	\$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS		an Karangtan a	ec que lacido.			n/a	
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS		1-Jan-2009		100001			40
Notes for DELAYED costs  AVOIDED COSTS	\$1,500	1-Jan-2009		=	\$0	==== n/a	\$0
Notes for DELAYED costs CO			2-Sep-2010	1.67	\$125	n/a	\$125
Notes for DELAYED costs CO	stimated co	st to train person	nel on environr	mental n	ermit limits and a	larm points that op	erations use to
Avoided Costs						f.non-compliance.	
			The second second second	A	ce was achieved.	ission compliance.	ine tillol darens
Disposal	ANNUAL	IZE [1] avoided	costs before	enterin	g item (except	for one-time avoi	ded costs)
• • • • • • • • • • • • • • • • • • • •	resultation of	\$160 S. \$165 S. #		0.00	\$0 * * * *	\$0	\$ 5.\$0
Personnel	9-118-1347 (46-1 <u>-1</u> 27			0.00	\$036.3	(特美 (海0))	★ 参\$.0
	a Aggor syan o	5 865 B F 15 4 2 1	Section bearings	0.00	\$0%	\$0	\$ 50
Supplies/equipment	AF Is fet wi		MATERIAL SECTION	0:00	\$0	\$0	\$0
Financial Assurance [2] ONE-TIME avoided costs [3]			3 70 U. P.W.4.85	0.00	\$0	\$0	\$0
Other (as needed)	S ARSONES TEST AND - Let 10 begin 10		le avisár frádskarsk Romanie viznasti vo	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)		compensation and	70 1.81 pt 58 50 53 st	<u> </u>	350	L \$V	<u> </u>
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Notes for AVOIDED costs				ri di			
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			ı				
Approx. Cost of Compliance		\$1,500					\$125

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Respondent TOTAL PETROCHEMICALS USA, INC.  Case 1D No. 40180  Reg. Ent. Reference No. RN102457520  Media [Statute] Finf. Coordinator
Reg. Ent. Reference No. RN102457520  Media [Statute] Air  Enf. Coordinator Audra Benolt  Violation Number Rule Cite(s)  30 Tex. Admin: Code \$5 116.115(b), (b)(2)(F) and (c), 122.143(4), Tex. Health & Safety Code \$ 382.085(b), FOR O-01267, STC 28, Air Permit No. 5694A, GC 8  Falled to comply with the allowableshourly emissions rates. Specifically, from January 29, 2009 to March 10, 2009, on July 7, 2009 and on November 3, 2009, the Respondent exceeded the authorized hourly emissions rates at Emissions Point Number ("SPN"). TREPHTRS of 15.75 pounds per hour ("Ibs/he") for carbon monoxide ("SPN"). TREPHTRS of 15.75 pounds per hour ("Ibs/he") for carbon monoxide ("SPN") and 14.85 lbs/nr for nitrogen oxides ("Not"), resulting in the release of SBB.45 lbs of CO and 2, 16 lbs of NOX.  **Separation**  **Percent**  **Release**  **Major**  **Release**  **Major**  **Moderate**  **Minor**  **Actual**  **Percent**  **Percent**  **Open Terest Percent**  **Percent**  **Open Terest Percent**  **Open Terest Percent**  **Matrix**  **Notes**  **Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation.  **Adjustment**  **Spoon**  **Adjustment**  **Spoon**  **Adjustment**  **Spoon**  **Production**  **Adjustment**  **Spoon**  **Spoon**  **Adjustment**
Media [Statute] Air  Enf. Coordinator Audra Benoit Violation Number Rule Cite(s)  30 Tex. Admin: Code 55 116.115(b), (b)(2)(F) and (c), 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, Air Permit No. 5694A, GC 8  Falled to Comply with the allowable hourly emissions rates. Specifically, from January 29, 2009 to March 10, 2009, on July 7, 2009 and on November 3, 2009, the Respondent exceeded the authorized hourly emissions rates at Emissions Point Number ("EPN") 17REFHTRS of 15.75 pounds per hour ("lbs/he") for carbon monoxide ("Cod") and 14.85 lbs/hr for introgen oxides ("Nox"), resulting in the release of 588.45 lbs of CO and 2.16 lbs of Nox.  **Separation**  **Percent**  **Release**  **Major**  **Matrix** **Notes**  **Podential**  **Percent**  **Major**  **Moderate**  **Minor**  **Moderate**  **Minor**  **Moderate**  **Minor**  **Moderate**  **Minor**  **Moderate**  **Minor**  **Moderate**  **Minor**  **Percent**  **Opending the analytic or the environment has been exposed to insignificant anoths of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation.  **Adjustment**  **Separation**  **Adjustment**  **Separation**  **Adjustment**  **Separation**  **Separation**  **Separation**  **Separation**  **Adjustment**  **Separation**  **Separation**  **Separation**  **The separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Percent**  **Description**  **Separation**  **Separation**  **Percent**  **Description**  **Separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Separation**  **Separat
Filed to comply with the allowable incurty emissions rates. Spedifically, from January 29, 2009 to March 10, 2009, or July 7, 2009 and on November 3, 2009, the Respondent exceeded the authorized sharp for carbon monoxide (*CQ*) and 14, 85 bs/h for introgen oxides. (*Nox*), resulting in the release of \$88.45 bs of CO and 2, 16 bs of Nox.    Percent
Violation Number Rule Cite(s)  30 Tex. Admin. Code.§§ 116.115(b), (b)(2)(F) and (c), 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, Air Permit No. 5694A, GC 8  Failed to comply with the allowable-bourly emissions rates. Specifically, from January 29, 2009 to March 10, 2009, on July 7, 2009 and on November 3, 2009, the Respondent Exceeded the guith-drized hourly emissions rates at Emissions Point Number ("EPN") 17REFHTRS of 15.75 pounds per hour ("los/he") for carbon monoxide ("CO") and 14.85 lbs/n for nitrogen oxides ("Nox"), resulting in the release of 588.45 lbs of CO and 2.16 lbs of Nox.  Base Penalty  \$10,000  **Percent
Safety Code § 382.085(b), FOP O-01267, STC 28, Air Permit No. 5694A, GC 8
Safety Code § 382,085(b), FOP O-01267, STC 28, Air Permit No. 5694A, GC 8  Falled to comply with the allowable hourly emissions rates. Specifically, from January 29, 2009 to March 10, 2009, on July 7, 2009 and on November 3, 2009, the Respondent exceeded the authorized hourly, emissions rates at Emissions Point Number ("FERN") JARREHITRS of 15.75 pounds per hour ("Iss/he") for carbon monoxide ("GO") and 14.85 bs/hr for nitrogen oxides ("Nox"), resulting in the release of 588.45 bs of CO and 2, 16 bs of Nox.  Base Penalty \$10,000  >> Environmental, Property and Human Health Matrix  Release Major Moderate Minor  OR. Actual Act
Failed to comply with the allowable hourly emissions rates. Spedifically, from January 29, 2009 to March 10, 2009, on July 7, 2009 and on November 3, 2009, the Respondent exceeded the authorized hourly emissions rates at Emissions Point Number ("EDN") JAREFHIRS of 15.75 pounds per hour ("Ibs/he") for carbon monoxide ("GO") and 14.85 ibs/n for nitrogen oxide ("Nov"), resulting in the release of 588.45 ibs of CO and 2.16 ibs of Nox.    Base Penalty   \$10,000
Violation Description  Violation Description  Violation Description  Violation Description  Violation Description  Windber (*PER*)*) 178EFHTRS of 15.75 pounds per hour (*PER*)*) 178EFHTRS of 15.75 poun
Violation Description  the Respondent exceeded the authorized hourly emissions rates at Emissions Point Number ("EPN") 17REFHTRS of 15.75 pounds per hour ("Ibs/hh"), for carbon monoxide ("GO") and 14.85 listyn for nitrogen oxides ("NOx"), resulting in the release of 588.45 list of CO and 2.16 list of NOx.  **Base Penalty**  **Separation**  **Base Penalty**  **Separation**  **Percent**  **OR.**  **Percent**  **Percent**  **Percent**  **Percent**  **Operation**  **Percent**  **Percent**  **Ow  **Human health or the environment has been exposed to insignificant anoughts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation.  **Adjustment**  **Adjustment**  **Proportion**  **Adjustment**  **Possible of NOx**  **Percent**  **Ow  **Percent**  **Ow  **Percent**  **Ow  **Adjustment**  **Possible of NOx**  **Percent**  **Ow  **Ow  **Percent**  **Ow  **Ow  **Percent**  **Ow  **Ow  **Ow  **Percent**  **Ow  **Ow  **Ow  **Ow  **Output and the Nox**  **Percent**  **Ow
Number ("FRN") 17REFHTRS of 15.75 pounds per hour ("lbs/hr") for carbon monoxide ("GO") and 14.85 iss/hr for nitrogen oxides ("NOX"), resulting in the release of 588.45 ilss of CO and 2.16 ibs of NOX.    Base Penalty   \$10,000
monoxide ("CO") and 14.85 ibs/nr for nitrogen oxides ("NOx"), resulting in the release of 588.45 ibs of CO and 2.16 ibs of NOX.    Base Penalty   \$10,000
Sase Penalty   \$10,000
>> Environmental, Property and Human Health Matrix  Harm  Release Major Moderate Minor  Actual Potential Percent 25%  >> Programmatic Matrix  Falsification Major Moderate Minor  Percent 0%  Matrix Notes Human health or the environment has been exposed to insignificant; amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation  Adjustment \$7,500  \$2,500  Number of Violation Events  Number of Violation Events  Number of Violation Events
>> Environmental, Property and Human Health Matrix  Harm  Release Major Moderate Minor  Actual Potential Percent 25%  >> Programmatic Matrix  Falsification Major Moderate Minor  Percent 0%  Matrix Notes Human health or the environment has been exposed to insignificant; amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation  Adjustment \$7,500  \$2,500  Number of Violation Events  Number of Violation Events  Number of Violation Events
Release Major Moderate Minor  Actual Potential
Release Major Moderate Minor Actual Potential Percent 25%  > Programmatic Matrix Faisification Major Moderate Minor Percent 0%  Matrix Notes Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation.  Adjustment \$7,500  \$2,500  Number of Violation Events 1 42 Number of violation days
Percent 25%  > Programmatic Matrix  Falsification Major Moderate Minor  Percent 0%  Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation:  Adjustment \$7,500  \$2,500  Number of Violation Events  Number of Violation Events  Number of Violation Events
> Programmatic Matrix Falsification Major Moderate Minor Percent 0%  Matrix Notes  Matrix Notes  Adjustment  \$7,500  \$2,500  Number of Violation Events  Number of Violation Events  Number of Violation Events  **Note**  **Note*
Falsification Major Moderate Minor  Percent 0%  Matrix Notes  Matrix Notes  Adjustment \$7,500  \$2,500  Number of Violation Events  Number of Violation Events  **Note***  **Note***  **Note**  **Not
Falsification Major Moderate Minor  Percent 0%  Matrix Notes  Matrix Notes  Adjustment \$7,500  \$2,500  Number of Violation Events  Number of Violation Events  **Note***  **Note***  **Note**  **Not
Matrix Notes
Notes not exceed levels that are protective of human health or environmental receptors as a result of this violation:  Adjustment \$7,500  \$2,500  Number of Violation Events   1   42   Number of violation days
Notes not exceed levels that are protective of human health or environmental receptors as a result of this violation:  Adjustment \$7,500  \$2,500  Number of Violation Events   1   42   Number of violation days
Notes violation:  Adjustment \$7,500  \$2,500  Violation Events  Number of Violation Events 1 42 Number of violation days
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Number of Violation Events Number of Violation Events Number of Violation days
Number of Violation Events
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mark only one monthly
with an x    Quarterly   Semiannual   \$2,500
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Öne:annual-eventils:recommended:
One annual events recommended.
Good Faith Efforts to Comply #625
Before NOV NOV to EDPRP/Settlement Offer Extraordinary
Ordinary ×
N/A (mark with x)
The Respondent completed corrective action for this
Notes Molation on February 5, 2010, prior to the July 26, 2010
Mind in the company of the company o
Violation Subtotal \$1,875
Economic Benefit (EB) for this violation Statutory Limit Test
Economic Benefit (EB) for this violation Statutory Limit Test  Estimated EB Amount \$183 Violation Final Penalty Total \$12,384  This violation Final Assessed Penalty (adjusted for limits) \$12,384

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		conomic	Benefit:	Wo	rksheet		of the second
Respondent		CHEMICALS USA,			E victoria un qui apparat de la con-		
Case ID No.		·			-		
Reg. Ent. Reference No.	RN102457520	)					
Media						Exercise are tribe	Years of
Violation No.	2					Percent Interest	Depreciation
	TOTAL SERVICE STREET,			ario Arabi		5.0	15
	Item Cost	Date Required	Final Date	Vrc	Interest Sayed	Onetime Costs	EB Amount
Item Description	CONTRACTOR OF STREET	TOTAL PROPERTY OF THE PARTY OF					LE Alliount
TIEM DESCRIPTION	: No commas or \$			u, iliya kara		Harring To a 1 7	and the second s
51 46 7			11 00 4 00 01 day 20 000 12 00 00 12 00 00 12 00 00 00 00 00 00 00 00 00 00 00 00 00				er else beelsaver
Delayed Costs	Share Foot	M= 20 2- = 2000		diam'r.			
Equipment Buildings	\$1,500	.   29-Jan-2009	<u> 5-Feb-2010</u> ·	1-02	\$5	\$102	\$1.07
Other (as needed)	-8 4904 AS		projector de la compania del compania del compania de la compania del compania de la compania del compania de la compania de la compania de la compania de la compania del c	0.00	\$02 - \$03	\$0	\$0
Engineering/construction				0.00	<u>- 현실 등 \$03 등 원</u> - 180 등 180 등 원	\$0 \$0	\$0 \$0
Lingmeering/construction	37 - 2245 - 136 - 13		en in Security for the contraction of the contracti	0.00	\$0		\$0
Record Keeping System	16 1 (March 143)	5 5 4 5 5 3 5 4 7 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5		0.00	\$0	n/a	\$0
Training/Sampling	* 400 FARESTE / 200 ACC	5	T.L. T. S. S. T. L. Chillian Language and	0.00	\$0	n/a	\$0 50
Remediation/Disposal	edicional and a graph of	5 800 0617 3	40 of the 2014 Economic lines	*0.00	\$0	1/0	\$0°
Permit Costs	- Jako es rigidados			0.00	\$0 40	11/4	\$0
Other (as needed)	\$1.500			1.02	\$76		\$76
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	control val	e to the Ovygon	and was very large	ocuso Nand	trala parasanalia	the modification of	iu tag out the
Notes for DELAYED costs	/# 1 0000 TI	ve co the Oxygen	ananyzen (\$1,50	o) anu	u an i personner i	r me-modification of	process now
	441,0002	ric unice i equit eu i				final date is the da	se compliance
				vas act			2
Avoided Costs						for one-time avoi	ded costs)
Disposal			<ul> <li>★ 3.5% X 20% C 4;</li> </ul>	0.00	\$01	\$0	\$0
Personnel	2007 MARINE NO. 117 8		BUT LEVELS WITH	0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling	to seein a	Water Sold AASS	\$ 1.09K FUNKE 144.	0.00	\$0	\$0	\$0
Supplies/equipment			2 Com 2 Brand C	0.00	\$0	\$0	\$0
Financial Assurance [2]	A CAPACINE IN		V V N P P SHEELEN	0.00	\$ \$0	\$0	\$0
ONE-TIME avoided costs [3]	. XX < Great State Line	CRACE OF MAKE IN A	era ever March (2011)	0.00	\$0 <b>*</b>	\$0	\$0
Other (as needed)	. 9 . 90 . 10 . 10 . 10		AND MEDICAL PROPERTY.	0.00		12 4 2 3 \$ 0 4	\$0
Notes for AVOIDED costs						·敦煌 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
110105101 71701515 00505				2 3			
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Approx. Cost of Compliance		\$3,000			TOTAL		\$183
, ,		43,000			k zaprosa i sa Milia E	· L	\$100

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Screening Date	11-Aug-2010	Docket No.	2010-1300-AIR-E	PĆW
	TOTAL PETROCHEMICALS U	ISA, INC.	PC	olicy Revision 2 (September 2002)
Case ID No. Reg. Ent. Reference No.				PCW Revision October 30, 2008
Media [Statute]				tingue of all the
Enf. Coordinator	Audra Benoit			Paper
Violation Number Rule Cite(s)		1 - 430 5 S.M 3 - 7 M. 5. Sept.		
Ruie Cite(s)	Pag revi waliliin cade 38 to	1.20(3), 116.115(b), (b) 382.085(b), FOP O-01267	2)(F) and (c), 122,143(	4), Tex.
And the state of t		and PSD-TX-688M2, SC		. NOS.
The state of the s	The state of the s			
	Falled to comply with the Specifically, the Responder	e allowable hourly emission		
Violation Description	he/hr of CO and the NO	x concentrations of 42 par		
Violation Destription	60¢0GENS1K; on Januar			
44 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	August 17, 2009 Decemb	e average concentrations		102.77
The state of the s				
			Base I	Penalty \$10,000
>> Environmental, Proper	ty and Human Healtl	ı Matrix		ver de la companya de
Release	Harm	Minor		Page and a constant
OR Actual		X		
Potential			Percent 25%	
>>Programmatic Matrix			TENDA AND A AND A AND A AND A AND A AND A A A A A A A A A A A A A A A A A A A	
Falsification	Major Moderate			
	frank i poda zaprijena na	4 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	Percent 0%	
Human health	or the environment has bee	en exposed to Insignifican	amounts of pollutants v	which do
	vels that are protective of ho	iman health or environme		
Figure 19 Control of the Control of		violation.		
		Ā	ljustment	\$7,500
		A	ljustment	\$7,500 \$2,500
Violation Events		<b>.</b>	ljustment	
Violation Events				\$2,500
	Violation Events	A	djustment Number of violation da	\$2,500
	Violation Events			\$2,500
	daily, weekly,			\$2,500
Number of mark only one	weekly. monthly			\$2,500
Number of	=daily weekly monthly quarterly x	322	Number of violation da	\$2,500 ays
Number of mark only one	daily weekly monthly quarterly semiannuals annual	322	Number of violation da	\$2,500 ays
Number of mark only one	=daily weekly monthly quarterly x	322	Number of violation da	\$2,500
Number of  mark only one with an x	daily weekly monthly quarterly semiannuals annual	322	Number of violation da	\$2,500 ays Penalty \$7,500
Number of  mark only one with an x	=daily weekly =monthly quarterly semiannuals annual single event	322	Number of violation da  Violation Base  Which the violations occ	\$2,500 ays Penalty \$7,500
Number of  mark only one with an x  Three quart	erly; events are recommend:	322 2 2 2 2 2 3 2 2 3 2 2 3 2 3 2 3	Number of violation da  Violation Base  Which the violations occ	\$2,500 ays  Penalty \$7,500
Number of  mark only one with an x	weekly. monthly quarterly: semiannuals annual single events erly: events are recommend.	ed for the quarters during  Nov to EDPRP/Settlement (	Number of violation da  Violation Base  Which the violations occ	\$2,500 ays  Penalty \$7,500
Number of  mark only one with an x  Three quart	erly events are recommend.  Extraordinary	ed for the quarters during  Nov to EDPRP/Settlement (	Number of violation da  Violation Base  Which the violations occ	\$2,500 ays  Penalty \$7,500
Number of  mark only one with an x  Three quart	erly events are recommend:    Display	ed for the quarters during  NOV to EDPRP/Settlement (	Number of violation da  Violation Base  Which the violations occ	\$2,500 ays  Penalty \$7,500
Number of  mark only one with an x  Three quart	erly events are recommend.    Div	ed for the quarters during  Nov to EDPRP/Settlement (  (mark with x)  condent completed correct	Number of violation da  Violation Base  Which the violations occurrence  Which the violations occur	\$2,500 ays  Penalty \$7,500
Number of  mark only one with an x  Three quart	erly events are recommend.  Extraordinary Ordinary N/A The Res	ed for the quarters during  Nov to EDPRP/Settlement (  (mark with x)  condent completed correction September 8, 2010, af	Number of violation da  Violation Base  Which the violations occurrent  which the violation base	\$2,500 ays  Penalty \$7,500
Number of  mark only one with an x  Three quart	erly events are recommend.  Extraordinary Ordinary N/A The Res	ed for the quarters during  Nov to EDPRP/Settlement (  (mark with x)  condent completed correct	Violation Base Which the violations occ  Which the violations occ  Ifter  Live actions for this Ler the July 26, 2010	\$2,500 says  Penalty \$7,500 surred: \$750
Number of  mark only one with an x  Three quart	erly events are recommend.  Extraordinary Ordinary N/A The Res	ed for the quarters during  Nov to EDPRP/Settlement (  (mark with x)  condent completed correction September 8, 2010, af	Number of violation da  Violation Base  Which the violations occurrent  which the violation base	\$2,500 says  Penalty \$7,500 surred: \$750
Number of  mark only one with an x  Three quart	erly events are recommendate straordinary Ordinary N/A  Notes  Weekly  monthly quarterly x  semiannuals annual single events  Before Nov Extraordinary N/A The Res violation of	ed for the quarters during  Nov to EDPRP/Settlement (  (mark with x)  condent completed correction September 8, 2010, af	Violation Base Which the violations occ  Which the violations occ  Ifter  Live actions for this Ler the July 26, 2010	\$2,500  Penalty \$7,500  surred: \$750
Mumber of  mark only one with an x  Three quart  Good Faith Efforts to Com  Economic Benefit (EB) for	erly events are recommendate straordinary Ordinary N/A  Notes  Weekly  monthly quarterly x  semiannuals annual single events  Before Nov Extraordinary N/A The Res violation of	ed for the quarters during  Nov to EDPRP/Settlement (  (mark with x)  condent completed correction September 8, 2010, af	Number of violation da  Violation Base  Which the violations occurrent  tive actions for this er the July 26, 2010  Violation S	\$2,500  Penalty \$7,500  surred: \$750  Test
Mumber of  mark only one with an x  Three quart  Good Faith Efforts to Com  Economic Benefit (EB) for	erly events are recommend.  Extraordinary Ordinary N/A The Res violation of the B Amount Led EB Amount	ed for the quarters during  NoV to EDPRP/Settlement (  NoV to EDPRP/Settlement (  X  (mark with x)  condent completed correction September 8, 2010, af NOE.	Violation Base Which the violations occ  Statutory Limit  Violation Final Penal	\$2,500  Penalty \$7,500  curred: \$750  Test  ty Total \$38,359

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	E	onomic	Benefit	Worksh	eet .		
Respondent		HEMICALS USA,				rificilizeBeterarararar	BACKETIE W. MCSTARK SMAKE
Case ID No.			1110.				
Reg. Ent. Reference No.							
and the second s					F		Years of
Violation No.					i i	Percent Interest	Depreciation
or in the second second		Committee of the commit					
g						5.0	
	Committee of the second	Date Required	Final Date	Yrs Interes	t Saved	Onetime Costs	EB Amount
Item Description	No commas or \$				227 - Juli 1973		
							,
Delayed Costs			u Britariye				
Equipment	28. 28. 30. 35. 35.	(2) 14 14 14 14 14 14 14 14 14 14 14 14 14	A-1011年11日本地議場2	0.00	<b>0</b> E 7 3 3	₹ 5\$0	\$ <b>\$10</b>
Buildings	at vitalist do. 14	A more supposed to the	8 1 32 THE EXP		0%	ં \$0 ·	\$0
Other (as needed)	· 医二种医疗 /	<b>企业的企业的企业</b>			0.54.3 /2.5 %	₽ \$ \$0 €	\$0
Engineering/construction		EARWINE NOW	TO THE DESIGNATION OF THE PERSON OF THE PERS	0.00	0	\$0	\$ + \$0
Land	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1		つった にたいみ おおからかか		0	- n/a	<u> </u>
Record Keeping System	78 SEC. 34. 10	to english biling			0%	=: =n/a ====	\$0
Training/Sampling	30-17-0-28-41		2.2		0	n/a :	\$0
Remediation/Disposal	3.485 (1968) 4 255 (1954)				0	is is sin/a.co is is l	\$0
Permit Costs	- # - 000°		MA SAMPLE SAME		0	n/a	\$0
Other (as needed)	\$2,000	28-Jan-2009	8-Sep-2010	1.61 \$1	61	n/a t	<u>\$161</u>
	Estimated cos	t to create and m	odify alarm poir	nts to control the	e unit to e	nsure a gulcker res	nonse time for
Notes for DELAYED costs						on-compliance. Th	
				mpliance was a			7 3 3 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5
YAATIMU MAAA					14 8 Pr - 4	484	4
Avoided Costs		ZE [1] avoided	costs before e	entering item (	except for	or one-time avoic	led costs)
Disposal	Z PANA	<b>デリング 大学 大学 大学 大学 大学 ヤ</b>	医三分乙基苯基乙烷	0.00	0	接号 350	3 <b>\$0</b>
Personnel	. Baddalite (12, 17)	Service	Market Property		0 💮	\$0	\$\$0
Inspection/Reporting/Sampling	AR NAMES OF THE		第四百章 · · · · · · · · · · · · · · · · · · ·		0 🔆 🚶	34名 350 x ショ	\$0
Supplies/equipment	.06.00000000000000000000000000000000000		e sven carrio		011	\$0	×\$0
Financial Assurance [2]		2.2.1.1.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2	TO A SERVE TO BE SERVED.		0346448	\$ 6.2\$0 (	\$0
ONE-TIME avoided costs [3]	186 1846 ARA 184	2010 St. (2000) 3-7	Y XX ()		0	.\$0	\$0
Other (as needed)	######################################	STATE STATE STATE OF	20 5 22 5 C 186 6 5 5 5 1	0:00	0**	\$0	\$0
						提及(製) 1. 多 基	
Notes for AVOIDED costs							
						네 보겠다.	
	A Arte at at a		4 ( . # 1 <u>2                                 </u>	<u> 19.854,87.4</u>	<u>1 (1 14), J</u>	<u> 4 4 4 5 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3</u>	<u> </u>
Approx. Cost of Compliance		\$2,000			TOTAL		\$161
				Section and the section of the secti			1

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Screening Date		PGW
Respondent Case ID No.	TOTAL PETROCHEMICALS USA, INC. 40180	Policy Revision 2 (September 2002) PCW Revision October 30, 2008
Reg. Ent. Reference No. Media [Statute]		To the state of th
<ul> <li>Enf. Coordinator</li> </ul>	Audra Benoit	Control of the contro
Violation Number Rule Cite(s)		
	30 Tex, Admin, Gode §§ 116.115(b)(2)(F) and (c), and 122.143(4), Te Safety Code § 382.085(b), FOP 0-01267, STC 28, and Air Permit No. 5	
	Stiety Group Specific Control of	305, 50 1
	Falled to comply with the allowable hourly emissions rates. Specifically, 5 and 16, 2009, during dally monitoring of the carbon canister breakth	on February
Violation Description	Respondent exceeded the authorized hourly emissions rate of 0.01 lbs/r organic compounds ("VOCs") at EPN 67TNK0660CC resulting in the rele	or of volatile
	bs of VOEs for 48 hours.	ase of 0.90
1		ase Penalty \$10,000
>> Environmental, Proper	ty and Human Health Matrix	•
Release	Harm Major Moderate Minor	7
OR Actual Potential	X Percent 259	<del>/</del> 6
>>Programmatic Matrix		-
Falsification	Major Moderate Minor	
	Percent 09	<u>/0]</u>
	or the environment has been exposed to insignificant amounts of polluta els that are protective of human health or environmental receptors as a	
Notes	violation:	
For the state of t	Adjustment	\$7,500]
		\$2,500
Violation Events		T Agenda Management George (1) to a major of military of the control of the contr
Number of \	/iolation Events	on days
	dally	
mark only one	weekly	
with an x	quarterly Violation B	ase Penalty \$2,500
	annual Single event	0 m
	Ohe quarterly event is recommended.	
Good Faith Efforts to Com	DIY Reduction  Before NOV NOV to EDPRP/Settlement Offer	\$0
	Extraordinary	•
	Ordinary (mark with x)	
	Notes The Respondent does not meet the good faith criteria fo	vi vr
COMPANY (COMPANY)	Violati	on Subtotal \$2,500
Economic Benefit (EB) for		
	ed EB Amount \$511 Violation Final P	
Estimat	<del></del>	
	This violation Final Assessed Penalty (adjuste	d for limits) \$13,055

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	i de Ec	onomic	Benefit	woi	ksheet:		
Respondent		HEMICALS USA,	INC.	Charles and annual	*** *** *** *** *** *** *** *** *** **		
Case ID No.							
Reg. Ent. Reference No.						Sec. (Million per l'implication repaire : Appendient per le manier maisse manier reseau reconstruire de l'arti	
Media - Media						Percent Interest	_Years of
Violation No.	7 <b>4</b> 	STALLED BEFORE	FV-Frankonandario	CHARLETTE SEE			Depreciation
G to kee during you, at allowing or while						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	A STATE OF THE STA					
							22
Delayed Costs							
Equipment	# #504 st	tf#4%@ac3;	Section of Management	0.00	⇒ ‰ . \$0⇒ . 4 :	\$0	\$0
Buildings	本 YUMA 美工工	ENERGY STATE OF THE	THE SEPTEMBERS OF THE SEPTEMBE	0.00	\$0	∴ \$ \\$0	\$0
Other (as needed)	· 建工务(主,基)。[1]	<b>一般来说,并来被</b> 信息。	ter statistic	0.00	\$0	\$0	\$0
Engineering/construction	PERMIT	<b>#158</b>		0.00	* \$0°	\$0.	\$0.
Land	26 200000000000000000000000000000000000	Kang Barir	美的。李维、巴拉特斯斯斯	0.00	¥ ¥ \$0	n/a	\$0
Record Keeping System	Sign of street, 125	<b>学级型LPTH多位</b>	(\$15 all 1944)	0.00	<u>\$</u> 0	n/a	\$0
Training/Sampling	- 30 / 50 September 112	BUSCEPHANE TO LAR	多.4.4.4.4.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.	0.00	\$ \$0	n/a = =	\$0
Remediation/Disposal	多. (19.33年 18.5 平平	- 174 - 40 - 20 - 32 - 42 - 43 - 43 - 43 - 43 - 43 - 43	医多种水色的 医多种	0.00	华基 \$0	n/a	\$0
Permit Costs	<b>第三副至 85,68</b>	产物理 多种基础基础	STE CONTRACTOR OF THE STEEL	0.00	\$0.	n/a	<b>.</b> \$0
Other (as needed)	\$5,000	<u>* 5-Feb-2009 *</u>	21-Feb=2011	2:04	<b>以於實511</b> 20.5年	n/a	\$511
Notes for DELAYED costs	The date requir	ed is the initial	date of non-com	ipllance.	The final date is	arbon canister syste the estimated date	of compliance.
Avoided Costs	ANNUALI	ZE [1] avoided	l costs before	enterin	g item (except	for one-time avoid	ded costs)
Disposal	7. Tr & 10.		#15.Efferosis	0.00	\$0	## × \$0 :	\$ - \$0
Personnel	125 (1955)	が特別技術を選択された		0.00	\$0.00	\$0	\$ \$0
nspection/Reporting/Sampling	26年4月5日本第2月5月	<b>经验证实验的证券</b>	E	0.00	<b>学院主\$0</b>	* * \$0	\$ \$0
Supplies/equipment	25 74 22 22	ACHERICATED AND ACT.	SHEET TAKE THE COST SO	0.00	<b>※学学 \$0</b> (*) さ	\$0	\$ <b>}</b> ≠ <b>30</b>
Financial Assurance [2]	· 辦心 權 (1) - 25 8 8 7 4	全不可能的 化基金基金 化二氯甲基	Contraction of the second	0.00	88 88 50 \$0 \$ 6 months	*********	\$0
ONE-TIME avoided costs [3]	. States it is a sign	\$-1 <b>55</b>	Part of Control Stiffers	0.00	>> \$0× <u>-</u>	See \$0	\$0
Other (as needed)	No Electric		46t 2.00.00 SERVE SERVE	0.00	<u> </u>	\$1 4 50	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$5,000		2000	TOTAL		\$511

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	ening Date			<b>t No.</b> 2010-1300-AIR-E	CONTRACTOR STATE OF A CONTRACTOR	ROW
		TOTAL PETROCHEMICALS	USA, INC.		•	n 2 (September 2002)
Reg. Ent. Re	Case ID No.	·			PCW Revi	sion October 30, 2008
	a [Statute]					i e e e e e e e e e e e e e e e e e e e
	Coordinator					plit
Viol	ation Number	THE STATE OF STREET AND STREET STREET,			manier in manier na manier	
	Rule Cite(s)	30 Text Admin Code	§§ 101.20(1) and (3	), 116.115(b)(2)(F) and (c	), and	
				ns ("CFR") § 60.104(a)(2)(		
			ith & Sarety Code § 3 os, 9195A and PSD-T)	82,085(b), FOP O-01267, X-453M6, SC 1 and 3	SIC 28, Air	
		b 14 1 1 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
\$1		Falled to comply with t Specifically, on May 9, 2				
Violatio	n Description	bourly amissions rate of		06 lbs/hr of hydrogen sulfic		
i violatio	in bescription	and 37,80, los/nr of SO		ery Tail Gas Thermal Oxidi		1
				bs of CO, 2.39 lbs of H2S, centration of 602 ppm.	87.5 IUS OI	
		E				
***************************************				Bas	se Penalty[	\$10,000
>> Environme	ntal, Proper	ty and Human Heal	th Matrix		er de er er	BERTAL STATEMENT
Price a principal of the price	Release	Harm Major Majoret				-
OR	Actual					
The common way of the common o			- W. (7.85 to 2.7)	Percent 25%	]	The state of the s
				Section and the section of the secti		
>>Programma	Falsification	Major Moderat	e Minor	Personal Control of the Control of t		
Each Comment of Cities of Table 5 to 10 to	4-1-1		The same of the sa	Percent 0%	]	en e
Lander, Marian School (* Spanis). Ser The National School (* Spanis). Ser The National School (* Spanis) and Spanis (* Spanis). Ser State (* Spanis) and Spanis (* Spanis) and Spanis (* Spanis). Ser State (* Spanis) and Spanis (* Spanis). Ser Spanis (* Spanis) and Spanis (* Spanis) and Spanis (* Spanis). Ser Spanis (* Spanis) and Spanis (* Spanis) and S						
Matrix				lficant amounts of pollutan		VICTORIAN
Notes		els that are protective or r	violation.	onmental receptors as a re	esult of this	
EMPLOYMENT OF THE PROPERTY OF		Photosic of Lagranders, reviews			لـــــا	
The second of th				Adjustment	\$7,500	-
			•		Γ	\$2,500
Violation Even	LS .	The Professional Association of the Section of the	Proprieta de la constanta del constanta de la	of the second contract and a second of the s		
A STATE OF THE STA	Number of \	Violation Events		142 Number of violation	n days	
						S1
The state of the s		dally, weekly				and beautiful
The state of the s		monthly				q quantity to
	mark only one with an x	quarterly		Violation Ba	se Penaity	\$2,500
		semlannual x				and a second
41		single event		•		
						1
		. One and	ual event is recomme	anded	9	1
		See Additional to	idal severicus secotinae	anded a second		
Grad Faire Fra		arkananan marakan mara ka	207 4 3			.47.50
Good Faith Eff	orts to com	PLY 10.0	Reduction  NOV to EDPRP/Settle	ment Offer	me hann ( mil) v galakti ( mil) v	\$250
		Extraordinary				
		Ordinary		Table 1 and		
		N/A			7	
4				corrective actions for this 10, after the July 26, 2010		
THE PROPERTY OF THE PROPERTY O		His control Safe and the				: -
		Mich wedin in benedic for ready a discrepance and a		Violatio	n Subtotal	\$2,250
Economic Ben	efit (ERN for	athic violation		Statutory Lim		
Economic Dell	Service Control (Service)	- Constitution - Sectional Sections - Section		7,000	_	
	Estimat	ted EB Amount	\$99	Violation Final Pe	naity Total	\$12,786
	mentions demonstration forms	This	violation Final Ass	essed Penalty (adjusted	for limits)	\$12,786
The real region of the real region of the real of the					The second secon	The state of the s

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Respondent		CONOMIC CHEMICALS USA,		Wo	rksheet		
Case ID No. Reg. Ent. Reference No. Media	RN102457520	i I					Years of
Violation No.						Percent Interest	Depreciation:
	ir gald g	The second secon				5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description					Die Sign (Alexander)		
The state of the s							to contract the sections.
Delayed Costs	i i i i ji da b						- Eddin TE
Equipment	Carried to a second	を表現される 第二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十	200 A\$K (1984S)200	0.00	158 P.A. \$08	<u>\$</u> \$0	\$0
Buildings	# 1.8% * C	2127704367	i protestant gan	0.00	\$ \$0	∵ - > \$0 -	\$0
Other (as needed)	- 60 ( P. 7867 8796), t. 1	· 不可能的,是有最为的的。()	g. Constitution	0.00	## <b>\$0</b> # . 4.	3.50 · ·	\$0
Engineering/construction	Ber Neitzungen, "	WEST C. \$1500 - \$	医多种 经经济	0.00	\$0	\$0	\$0
Land	139, 023, 240, 10	C 150 CT	t fitsk byddyrei	0.00	\$0	n/a	. \$0
Record Keeping System	\$4 m32 m6 18 K m	Sussed versions (2007)	No. 2m.h diversity (1)	0.00	\$0.	n/a	\$0
Training/Sampling	-47, 1888 JST 1988 13		A.12 - 1743/2444 (A.12)	0.00	\$ \$0	n/a	\$0
Remediation/Disposal	1,500 - 2,500 - 2,400 - 2,500	granter and the	FA STANGENS	0.00	\$0	fina n/a	\$0
Permit Costs	#4 . # <u>1, 1</u> 77 . 1 8		the will be the second of the	0.00	\$ \$0	n/a	\$0
Other (as needed)	\$1,500	9-May-2009	2-Sep-2010	1.32	\$99	n/a ===	\$99
Notes for DELAYED costs  AVOIDED COSTS	permit limit ex	ceedance, The d	ate required is compli	he init ance w	ial date of non-cor vas achleved.	oints that operation npliance. The final	date is the date
Disposal	age challes of Micc. Sec.		50 cgc 90 - 30 U	0.00	s so	\$0	.cu costs/
Personnel	21524832222222		Titus (1881) Albanda (1881)	0.00	\$0	\$0	\$0
spection/Reporting/Sampling	- Greek Street Co	in Alexandra Vigoropo (no. 1.	Notes and Association	0.00	\$0	-\$0 -\$0	\$0
Supplies/equipment	10 10 10 10 10 10 10 10 10 10 10 10 10	500 400 94 093645 120-1	Vok sam, Dreist gilber	0.00	\$0	*\$0	=\$0
Financial Assurance [2]	AC 1600 billiografia	SHEETS OF SHEETS AND A	wielieko sizerkierak	0.00	\$0	# % \$0	\$0
ONE-TIME avoided costs [3]	A 1. Market 1921 113	. zemárovánia defet Los e	বি বিশ্বনিদ্বিত্তি হৈ বিশ্বনিদ্বিত্তি ।	0.00	30 - 32 SOS 30 S	** *\$0	\$0
Other (as needed)	A destriction	E SACHA O GRAZZOTO O	.5. 1. 520 • 63 <b>0</b> • 630 6	0.00	Sagradi Specie of	\$0	* \$0 ·
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1.500			TOTAL		400

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Screening Date			ket No. 2010-1300-AIR-E		PCW
	TOTAL PETROCHEM	IICALS USA, INC.		•	? (September 2002)
Case ID No. Reg. Ent. Reference No.	:			PCW Revision	n October 30, 2008
Media [Statute]					,
Enf. Coordinator					and the second
Violation Number					
Rule Cite(s)	30 Tex. Admin. C	ode §§ 101.20(3), 116.1	15(b), (b)(2)(F) and (c), and 1	22.143(4),	***************************************
	Tex. Health & Safe	etý Code § 382.085(b), F 18936 and PSD-	OP 0-01267, STC 28, and Alr TX-762M3, SC 8	Permit Nos.	***************************************
Violation Description	Specifically, on Jo authorized hour y 500 ppm at the resulting in the rele	ulý 8, 2009 and Decembe / emission rate of 143.69 Regenerator Flue Gas Po ease of 219.72 lbs of CO	rly emissions rates and concener 8, 2009; the Respondent excloser, of CO and the CO concentrates 2000 Project (8), EPN 55RG and the average CO concentrates.	ceeded the entration of ENFLUGS,	
	L.			ase Penaity	\$10,000
>> Environmental, Proper	ty and Human	Health Matrix		-	
MC framer of the party of the desired frame of the party		Harm			
Release OR Actual	Y	oderate Minor			
Potential			Percent 25%		for passed for men
>>Programmatic Matrix			plant in the first of the graph and the production of the graph and the		
Falsification	4 P	loderate Minor	D	İ	à an air
See the second s	1800 - 1800 - 1802 <b>-</b> 1802 -		Percent 0%		an a
Human healt	h or the environmer	it has been exposed to In	significant amounts of pollutar	nts which do	PH officers
		tive of human health or a	environmental receptors as a r		nome in the second
	- \$5.7. gr - 12. gr \$5. gr	violation:			and the state of t
	_		Adjustment	\$7,500	Hvun
	The second secon			47,200	***
					\$2,500
Violation Events					4964444
	Violation Events		Number of violation	days	name and the second
Andreas American	daily	A THE PROPERTY OF THE PROPERTY			And And
	weekly				
	monthly	da afor agreed t			
mark only one with an x	quarterly		Violation B	ase Penalty	\$2,500
en care de la care de	semiannual		•		uhumodiff
	annual.	X			rameter -
					and depth and
					**
		One annual event is reco	mmended.		
	32 3 982 23				1177
Good Faith Efforts to Com		10.0% Reduction			\$250
1.1		efore NOV NOV to EDPRP/Se			1
On marketic	<del>Halium</del>				
THE PARTY AND TH	' lacer	(mark with x)	- April Control		
a change	· .		ed conrective actions for this		MAN AND AND AND AND AND AND AND AND AND A
	Na	olation on September 9,	2010; after the July 26, 2010		
Table 1 control of the control of th	<u> </u>	<u> </u>		ion Subtotal	\$2,250
Electronica Decizin / EDN 4-	ethic violatics				12,230
Economic Benefit (EB) for			Statutory Limi		
Estimat	ted EB Amount	\$29	Violation Final P	enalty Total	\$12,786
		This violation Fina	l Assessed Penalty (adjuste	ed for limits)	\$12,786

	·		

Respondent Case ID No. Reg. Ent. Reference No.	TOTAL PETRO 40180	ONOMIC CHEMICALS USA,		Wo	rksheet		
er Media	Alr					Percent Interest	Years of
Violation No.	6			g January	BULLARANS NA NENEWOTAN		Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	- No commas or \$			i i de			f <b>M</b> uritudu
							a likeromor bas
Delayed Costs Equipment	- 60 - KRESTE - 52 - 150	E Tressage rates and	eris valensiareanid	0.00	3.50 <b>\$</b> 0	\$0	\$0
Buildings	200 12 TO STORY OF THE	B. Sec. of Manager	1. 7 5 N. C. (1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	0.00	\$0	\$0	* \$.55 <b>5</b> 0
Other (as needed)	80-453262 Docas		St. A.C. T. CAMPAGE AND	0.00	\$0	30 3 2 3 <b>5</b> 0	- \$0 ≪\$0
Engineering/construction	W. 1888 20 15	8 445 <del>48</del> 445 1	# 125 MONEY	0.00	\$0	\$0	\$0
Land		K wasser, some	Errical Statemen	0.00	\$0	nya	\$0 
Record Keeping System	#5 ( B < ( ) 48 ( X )			0.00	\$0	n/a	\$0
Training/Sampling	188. 448.8E. (** SE. ) (**)	PERSONAL SPECIFICAÇÃO SE	0.0-0.000.000.00	0.00	\$0	n/a	\$0
Remediation/Disposal	35 New 2001 600	COLUMN CONTRACTOR	Status Vistoria	0.00	\$0	n/a	\$0
Permit Costs	St. S.M.C. 2002 Co.	K-04,212-1-68 (15885-000) 94	20,4,380 43,683433.43	0.00	- 30 - 2- 4-2 so ∴	n/a	\$0
Other (as needed)	\$500		**9-Sep-2010	1 17	\$29	n/a	\$29
Notes for DELAYED costs	date required	s the initial date	of non-compliar	ice. Th	ie final date is the	tance of managing a date the complianc	e was achieved.
Avoided Costs	ANNUAL	IZE [1] avoided	costs before		ng item (except	for one-time avoid	led costs)
Disposal	38 2 2 3 2 4 2 3 4 5 5 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	全线集员(高级路径)。	Water Mean Zig-	0.00	\$ \$0 \$	\$0 \$ \$	。 ○ ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) (
Personnel	1962 751 251 250 250	CONTRACTOR OF THE	05, 5x 35, 43, 43, 60	0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling	<b>一种"自然的"。</b> 是是一个实	21-24-24 C-14-15-15-15-15-15-15-15-15-15-15-15-15-15-		0.00	**************************************	\$0	\$ 600
Supplies/equipment	12 10TH 501 FIE	等等等。在100g/dec.1000 的	400人等 专业实际	0.00	\$0	#	\$0
Financial Assurance [2]	iga ográsia. Vizza esta	<b>24.7 美国的国际发展的基础的</b>	1667 生产发光线的 66.2K	0:00	\$0 CD	\$0	\$ \$0
ONE-TIME avoided costs [3]	·斯兰·莱克·克尔·克	CONTRACTOR OF THE	के.से अभ्यत्स्य विशेष्ट्रेत्रात	0.00		\$0	° \$0
Other (as needed)	grander in		15 to 4 \$5555	0.00	-% \$0 ·	***************************************	¥ \$0
Notes for AVOIDED costs		The state of the s					
Approx. Cost of Compliance		\$500	]		TOTAL		\$29

Screening Date		<b>Docket No.</b> 2010-1300-AIR-	PGW=
	TOTAL PETROCHEMICALS USA, 1	INC.	Policy Revision 2 (September 2002)
Case ID No Reg. Ent. Reference No			PCW Revision October 30, 2008
Media [Statute]	Air		
Enf. Coordinatoi			· ·
Violation Numbe Rule Cite(s			
		13:780, 116:115(c), and 122:143(4), 4 fety Code § 382:085(b), FOP O-01267	STC 28, and
		Permit No. 5694A, SC 3	(1.1.187
Wielskies Beeseichten	maximum temperature of 266.6	emperature at the chlorosorb inlet. Spe degrees Fahrenhelt was exceeded in t	
Violation Description	Inlet by 4.05 degrees Fahrer	nheit on September 15, 2009, and 1.7.	
	Fanrenn	nelt on September 13, 2009,	
-	10.000 TOTAL ST. 10.00 TOTAL S		
		E	Base Penalty \$10,000
>> Environmental, Prope	rty and Human Health Ma Harm	itrix	Organization and Company of the Comp
Release	e Major Moderate	Minor	• '00
OR Actua Potentia		Percent 10	
FOLEITLIA	TENNESS CONTRACTOR OF THE PROPERTY OF THE PROP	Percent 10	0%
>>Programmatic Matrix	A proposal production of the control		
Falsification	· · · · · · · · · · · · · · · · · · ·	Minor Percent (	0%
Continued to the contin			1
Matrix Which would	Ith or the environment will or coul	d be exposed to insignificant amounts ve of human health or environmental r	of pollutants
Notes Notes		this violation	3 3
Service of the servic			40.000
A CONTRACTOR OF THE PROPERTY O		Adjustment	\$9,000
			\$1,000
Violation Events			Agency of the control
	德主義2、中心。	Number of violat	ion days
	====daily=====		
	weekly		
mark only one	monthly: quarterly	Violation I	Base Penalty \$2,000
with an x	= semiannual =		
	annual x		and the second s
		ed for the two temperature exceedance	
	강한다 아이 가득하는 그는 학문 학생들은 생활 청소속을 받은 사람이 하는데 살았다.	the state of the s	(2) (a) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c
Good Faith Efforts to Com			\$500
EGOOGUESHAIREHKORESHOREGII		GUGTION  V to EDPRP/Settlement Offer	\$500
	Extraordinary		41.
NA PARAMATANA	Ordinary AX (ma	Selection VA	The state of the s
	, , , , , , , , , , , , , , , , , , , ,	ent completed corrective actions for this	
To the second se	■ 28 APP 1.21 APP	ne 17, 2010, prior to the July 26, 201	. a
-		Viola	tion Subtotal \$1,500
Economic Benefit (EB) fo	r this violation	Statutory Li	mit Test
	•		
Estima	ted EB Amount	\$19 Violation Final I	Penalty Total \$9,907
Estíma	<b>L</b>	\$19 Violation Final I	-

			n – Lacius	AJZ.	Tialas I		
	Produce added 1 WIN, CO. (AND LINES SERVICED)	conomic	Allocation a general blanch and allocation and the	VYOI	KSHEEL		
		CHEMICALS USA,	INC.				
Case ID No.	3						
Reg. Ent. Reference No.						Standistation in team or relative to the relative between the School Michigan (1900)	a co-leveral Manhair designative single has constitute.
Media						Percent Interest	Years of
Violation No.	7						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	The first state of the state of			9.75			Tarresta esta esta esta esta esta esta esta
	MO COLLUITIES OF A		(1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,	CVETCVE-TARE		in in the installation of the state of the s	Y OCCUPATION AND ADMITTAL PAGE
Delayed Costs				A KIT TURKKU	ALIANTEAN STUTTONS OF BA		
Equipment	A SECTION	B-075 ( CAL) - (6 SY 6 )		0.00	(3 16 <b>\$</b> 06	5	\$0
Equipment Buildings		m canter meet \$4 ×		0.00		\$0	\$ \$0
Other (as needed)	\$ 200.000	- 1.000 (100 (100 (100 (100 (100 (100 (10	C P THE RUPE THE	0.00	** \$0 *	3 \$ 350	\$0
Engineering/construction	# \$20 % A BCC 6 8	PARA A PROPERTY S	es assess 189	0.00	\$0	\$0	\$0
Land	5: \$550 v vj. 5	\$ -6 \$ 5 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		0.00	\$ \$0 .	n/a	\$0
Record Keeping System	· · · · · · · · · · · · · · · · · · ·	postover our received of	1815 - 1818 - N. 1864 - 1819	0.00	# \$0804 )	n/a	\$0
Training/Sampling	18. 0 Me upp 1861 1154	PAYER DV MERK RE	950 医抗毛霉素 经销售额	0.00	\$0	n/a	\$0
Remediation/Disposal	- 関、医療の政権がある。 と		A Properties	0.00	2 K \$0° + 1	""⊒" #≝n/a	\$0
Permit Costs	25 1,385 2: 3:755 mg	<b>这世級/共和國 14為16</b> 2.41		0:00	\$1000 \$000 · · · ·	n/a	\$50
Other (as needed)	: <b>2</b> \$500 ≈ ∞	13-Sep-2009	*17-Jun-2010	0.76	** \$19 × × ·	n/a	×\$1'9
Notes for DELAYED costs			date of the max	lmum l		ntrol during perlods edance. The final d	
Avoided Costs	ANNUAL	IZE [1] avoided	costs before a	nterin	ig item (except	for one-time avoid	led costs)
Disposal	12 1 Carlot St. 1820 (2)		a an	0.00	\$0-71	\$ \$0 4	\$0
Personnel	- 第三変紀第144	2. 1967.25 高端数 (P.C.)	并不 <b>有数据</b>	0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling	BE ESPERIE ON LON			0.00	\$0	\$0	\$0
Supplies/equipment	大学 医	4. FR. X. X. SEC. 3. 4	<b>美工业等区的基本。</b> 的	0:00	ાર્કે, લેકે <b>.\$0</b> ≎ે.!ે :	\$0	\$0
Financial Assurance [2]	3 487 Y 9	以表达: 医蒙古代 500 P		0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]	R-195507 884 75	(850年)、福祉といる	4: A\$ABBABABA	0.00	N \$ \$0	\$0	\$0
Other (as needed)	\$ 4 per 11 do 1	ta Asia di Marite da M		0.00	******** <b>\$0</b>	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$500		***************************************	TÓTAL		\$19

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Screening Date		PCW
		ry Revision 2 (September 2002)
Case ID No. Reg. Ent. Reference No.		PCW Revision October 30, 2008
Media [Statute]		· · · · · · · · · · · · · · · · · · ·
Enf. Coordinator	Audra Benoit	
Violation Number		- Annia de la companya de la company
Rule Cite(s)	[ 30 167. 301111. Code 33 100.0, 110.113(b) alid 0/(2/(1), alid 122,143(4),	
	Health & Safety Gode \$ 382.085(b), FOP 0-01267, STC 28, Air Permit Nos. 56	
	and 18936 and PSD-TX-762M2; GC 8, Air Permit Nos. 46396 and PSD-TX-10 56385; and 46409; SC 1	1/3,
	Balled to comply with the annual allowable emission rates. Specifically, fro January 1, 2008 to December 31, 2008, the Respondent exceeded the author	
	annual VOC emissions rate by a total of Q atons per year ("toy") for 14 tan	
. Violation Description	From January 1, 2009 through December 31, 2009, the Respondent exceeded	d the
	authorized annual VOC emissions rate by a total of 11.1 tpy for 14 tanks. S Attachment 2;	ee
ng gar aparidos ain a glat ataligas abidisti, aju es a classificação anticologica ataligas de constante de co	Base Pe	enalty \$10,000
>> Environmental, Prope	ty and Human Health Matrix	t de la company
Release	<b>Harm</b> Major Moderate Minor	
<b>OR</b> Actua		2. IN 49 AP
Potentia Potentia	Percent 25%	let
>>Programmatic Matrix		- V
<u>Falsification</u>	Major Moderate Minor	
Participation of the Committee of the Co	Percent 0%	·
Sign Section 1		3
Matrix not exceed le	or the environment has been exposed to insignificant amounts of pollutants wh rels that are protective of human health or environmental receptors as a result	of this
Notes	ylolation see the	4 (
The state of the s		manager or continued to
	Adjustment \$	7,500
		\$2,500
Violation Events		Section 1.
	Number of violation days	S
	daliy	
THE CONTRACTOR OF THE CONTRACT	Weekly	
mark only one	monthly	
with an x	quartedy Violation Base Pe	enalty \$5,000
	semiannual x .	
	single event.	
Francisco de la constanta de l		·
	Two:annual events are recommended for 2008 and 2009.	
	involentual events are accommended to 2000 and 2000.	
P		20022000
Good Faith Efforts to Com	Ply 0.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer	\$0
urverbill	Extraordinary Extraordinary	
THE PERSON NAMED IN COLUMN TO SERVICE AND	Ordinary	-
101	N/A (mark with x)	
THE PROPERTY OF THE PROPERTY O	The Respondent does not meet the good faith criteria for	
the first state of the first sta	Notes this violation.	
The state of the s	Control of the Contro	
	Violation Su	
Economic Benefit (EB) fo	`this violation Statutory Limit⊑Te	est
Estima	ted EB Amount \$801 Violation Final Penalty	
	This violation Final Assessed Penalty (adjusted for l	limits) \$26, <b>1</b> 10
	TALLEMENT DELICIONARIO CONTROL DE SERVICIO AL CONTROL DE CONTROL D	Commence of the Commence of th

· . .

Case ID No. Reg. Ent. Reference No.	TOTAL PETRO 40180 RN102457520	<b>CONOMIC</b> CHEMICALS USA, D		Woi	rksh	eet :		100 E	
Media Violation No.			tu Shika Sun wasan menganya penganya se		ngrapa ipati :		Percent Inte	rest	Years of Depreciation
							Automator name of the state of	5.0	15
	CONTRACTOR AND	The second labor to the second	Final Date	Yrs	Interes	st Saved	Onetime Co	stš	EB Amount
Item Description	No commas or s	Participation of the second of						11.	
		a paramananan saharan da	tiga gapagi it Maga satas ta tamba sa ta	normality symmetry and	ambiming trials (see	ja kirjas Oliko dagrasii kirjo	contemporaries in terror to Patrick, allowance	. 43 88.596	Z., confidencial for magnifestation of the more
Delayed Costs					al bok	如于野洋		11 7 1	
Equipment	\$2 \$0.00 pr -0	(*49.2423CF	是一句 2年·3年提供中国	0.00	The second second	0.4	: : : \$0		\$0
Buildings	1 T. 1	P Day of Contract of	i. len elmpe.or	0.00		0.	\$0	<u> </u>	\$0
Other (as needed) Engineering/construction				0.00		0	\$0		\$0
Engineering/construction Land	# 5-2. G	5	(# ¥ 940 > 88-94, 550 10 - 138-14-38441, 1840	0.00		0 4	*\$0	S.	\$0
Record Keeping System	A SECTION OF THE			0.00		0	n/a		\$0
Training/Sampling		SCHOOL CONTRACTOR		00.00		000 000	n/a		\$0
Remediation/Disposal	. # % S		S SE SERVI	0.00		50	n/a n/a		\$0
Permit Costs	281 MANUAL SOLUTION			0.00		0 1	n/a	21 22	\$0 \$0
Other (as needed)	* \$5:000 ·	1-1an-2008 ×	15-Mar-2011:	3.20		201	n/a		\$801
Notes for DELAYED costs			final date is th	e estim	atéd dat	e of comp	llance.	1	
Avoided Costs		IZE [1] avoided	costs before	enterin	ig item	(except	for one-time	avoi	ied costs)
Disposal	[38.474] . (A)	C 19 10 20 12 12 12 12 12 12 12 12 12 12 12 12 12		0.00		0 2 2	S# 4.3\$0 S	4,	\$0
Personnel	16 (16) 10 Be o	***************************************	Part Brown State of	0.00		0	\$0		\$ \$0 4
Inspection/Reporting/Sampling	, 957-20:45.00s 2.		· (4) · · · · · · · · · · · · · · · · · · ·	0.00		0	∴÷ `\$0	-; :	\$ : #1\$0=14.5
Supplies/equipment	Springer, Allers	· 图象是1000年代次次	or grant table the	0.00		0	±3 = `\$0		\$0
Financial Assurance [2]	# 200 A 10	a CASSIF SA SARASSA	Je belevkichten	0:00		0	\$0		\$0
ONE-TIME avoided costs [3]	新加州人 经证	10 62 40 600 (1988, 1997) -	Star et filosof basel baller	0:00		:02	** \$0		\$0
Other (as needed)	X2 - 38 (2) x45; 5;	「日本語」はいる他に対象がある。か	金の 食いとう (を)を)	0.00	ARLANDA S	<u>}0</u>	6.4 × · · · \$0		<u>\$0</u>
Notes for AVOIDED costs									
Approx. Cost of Compliance		\$5,000				TOTAL			\$801

Screening Date		PĆW
Respondent Case ID No.		tion 2 (September 2002) evision October 30, 2008
Reg. Ent. Reference No.	RN102457520	,
Media [Statute] Enf. Coordinator		
Violation Number	70 % 970 xx	
Rule Cite(s)	30 Tex. Admin. Code §§ 116:110(a), 116:115(c) and 122:143(4), Tex. Health & Safety Code § 382:085(b), FOP 0=01267, STC 28 and Air Permit No. 49743, SC 4	LOCATION OF THE PROPERTY OF TH
Violation Description	Failed to authorize Tank 586, EPN 22TANK0586, for current service. Specifically, for	
	Base Penalty	\$10,000
>> Environmental, Prope	ty and Human Health Matrix	111 801 1434 1536
Release		11 (1)
OR Actua Potentia	Provide a first of the control of th	us valenus respectivos.
>>Programmatic Matrix		erisement versi
Falsification	Major Moderate Minor Percent 25%	Contraction of the Contraction o
The state of the s		1
Matrix Notes	1,00% of the rule requirement was not met.	THE PROPERTY OF THE PROPERTY O
	Adjustment \$7,500	
Table State		\$2,500
Violation Events		
Section of Contraction (Contraction Contraction Contra	Violation Events 2 Number of violation days	and particular section of the sectio
	The state of the s	uniya agamaya naki
mark only one	dally: weekly: monthly: x	45.000
with an x	guarterly Violation Base Penalty	\$5,000
	single-event	
		1
	Two monthly events are recommended:	Winds of the state
Good Faith Efforts to Con	DIY 0.0% Reduction	\$0
9,000,7,81111-11101105-10-2011	Before NOV NOV to EDPRP/Settlement Offer	
	Ordinary	· Industrial
	・ N/A (mark with x)	
	Notes The Respondent does not meet the good faith criteria for this violation.	To construct the second
	Violation Subtota	1 \$5,000
Economic Benefit (EB) fo	this violation Statutory Limit Test	
Estima	ted EB Amount \$0 Violation Final Penalty Tota	\$26,110
	This violation Final Assessed Penalty (adjusted for limits	\$26,110

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•		
•		
	•	
		1

				Worksheet		
Respondent Case ID No.		CHEMICALS USA,	INC.			
Reg. Ent. Reference No.	\$				•	
xeg. Entracere rence no.					Inches and the second second	Years of
Violation No.					Percent Interest	Depreciation
	. <b>.</b> 1945: 1840: A.Q. (3)		- Santara da Santara			e central de la compansa de la comp
					5.0	15
a sanasi yekane idanili.	The state of the same of the s	Date Required	Final Date	Yrs = Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	140 April 17 17 17 17 17 17 17 17 17 17 17 17 17	Jack englished	ui ja iki ja ja koma Fe	vata etaka etak	Lijan den e
	to magning again all an early of the company	Name	a maja agai angan anna yana a sera ca a ca ca	27-2750s.co.		
Delayed Costs		The state of the s	arning it grows by			
Equipment	- 後: 『鏡/21 (歌) (25	和建设设施的设施。	ion cantivida disp	0.00 50 50	± \$0	5 i 2/\$10 i i i
Buildings	38 (38 64 (D. 25)	\$45\$T.194\$E\$\$\$15.9	afinal waspe	0.00 \$0	2 \$0	.\$0
Other (as needed) Engineering/construction	25.420 L 82.5		Rein de la Seguina de la company de la compa	0.00	\$2.5 \$0.5	\$0:
Land	SPECIAL SECTION OF A SECTION OF	Fig. 800 CAN DESCRIPTION OF	eri Pakabababababa Sakababababababa	0.001 * \$0	\$0 n/a	\$0 \$0
Record Keeping System	\$270.000.000	ROTE AND A	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	0.00	n/a	= = \$.0 = 2.50
Training/Sampling	oNC. (See J. SEE A.)			0.00 \$0	n/a ≏n/a	- \$0
Remediation/Disposal	194,5532,55,653,51	5-18-18-18-18-18-18-18-18-18-18-18-18-18-		0:00 so	n/a	\$0
Permit Costs		Parantu Musikasi 1	CARTE T PERSON	0.00	n/a	- \$0
Other (as needed)	· 中国 不解 (2世紀29 年)		on the resident	0.00	l n/a €	\$0
Notes for DELAYED costs		This estima	ed cost for this	violation is included with	r violation no: 8	
Avoided Costs	ANNUAL.	IZE [1] avoided	costs before	entering item (except	for one-time avoid	ded costs) 🥉
Disposal	W/2018.287.1			0.00 \$ \$00	## # <b>\\$0</b> .*	\$ \$0
Personnel	20.78mm/数。2		# J. N. A. A. (1999)	0.00	\$0.	<b>\$0</b>
spection/Reporting/Sampling	THE STREET STREET		12.005 at 1966 2 3-2	0.00 \$0	\$50	ž ₹ <b>\$</b> \$0
Supplies/equipment	190 (1920) - 190 (190 (190 (190 (190 (190 (190 (190	**************************************	Mar - 81 - 2018 424 2	0.00 5 50	\$0	± 4 ≠ <b>\$</b> 0′
Financial Assurance [2] ONE-TIME avoided costs [3]	1967 : 422 (S. 1984)   1964   1965   1984   1984   1985   1985   1985   1985   1985   1985   1985   1985   1985   1985   1985   1985	Elizabeth Service CERC	e i la estada de la compansión de la compa	0.00	\$0	\$0
Other (as needed)	a est o constant all all all all all all all all all al	5-85-50-4-50-4-50-50-50-50-50-50-50-50-50-50-50-50-50-	CONTRACTOR	0700 \$0 \$0	\$0	\$0 ~
other (as needed)	98 2 90 2 59 2	niorigrafia de la latinada de la como	OF A MODELLIK MARKETINE	DAMA	1/ 200 C	<u> </u>
Notes for AVOIDED costs						
Approx. Cost of Compliance		\$0]		a receipt a TOTAL		\$0

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Screening Date		<b>₽₽€</b> ₩≅
		sion 2 (September 2002)
Case ID No.		evision October 30, 2008
Reg. Ent. Reference No. Media [Statute]		gi - yez
Enf. Coordinator		gay maga
Violation Number	puntuani and and a second a se	E
Rule Cite(s)	30 Tex. Admin, Code §§ 101:20(3), 116:115(c), and 122:143(4), Tex. Health &	
	Safety Code § 382.085(b), FOP 0-01267, STC 28, and Air Permit Nos. 46396 and	
	PSD-TX-1073, SC 18 and 19, (previously SC 10)	
	Failed to load within the allowable annual throughput rates at Dock Nos. 1 and 3.	
Violation Description	Specifically the Respondent exceeded the annual throughput rates in 2006 by 36%,	
-	in 2007 by 44%, and in 2008 by 46%.	
		, , , , , , , , , , , , , , , , , , ,
	Base Penalty	\$10,000
>> Environmental, Proper	ty and Human Health Matrix Harm	
Release	Major Moderate Minor	
OR Actual		2 Testing
Potential	Percent 25%	₩ Pool-
>>Programmatic Matrix		). Line supple
Falsification	Major Moderate Minor	•
	Percent 0%	
		<b>4</b> 1
	or the environment has been exposed to insignificant amounts of pollutants which do	
Notes not exceed lev	els that are protective of human health or environmental receptors as a result of this violation.	
	A CONTRACT OF THE PROPERTY OF	1
	Adjustment \$7,500	]
		42.500
		\$2,500
Violation Events		
Number of '	/lolation Events 3 Number of violation days	U de la companya de l
Total Andrews	daily	1
	weekly.	91
mark only one	montbly	
i mark only one with an x	opuarterly: Violation Base Penalty	\$7,500
	semiannual x 3.	
	annual x 3	
	Transport and stands Andrews and the stands of the stands	
	Three annual events are recommended.	
[25.62. 4.4 0.000 , 80.00		<b></b>
Good Faith Efforts to Com	ply 0.0% Reduction	\$0
	Before NOV NOV to EDPRP/Settlement Offer	
T under the control of the control o	Extraordinary State Stat	
1	Ordinary	3
income.	N/A X ((mark with x)	i de la companya de l
	Notes The Respondent does not meet the good falth criteria for	
	this violation	
NOT THE PROPERTY OF THE PROPER	<del>Антисто по вышения судения судения по постору до вышения вышения вышения вышения вышения вышения вышения.</del>	
	Violation Subtota	il <u>\$7,500</u>
Economic Benefit (EB) for	this violation Statutory Limit Test.	
Estimat	ed EB Amount \$0 Violation Final Penalty Tota	\$39,165
	This violation Final Assessed Penalty (adjusted for limits	) \$39,165

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	Ec	conomic E	3enefit	Worksheet		- pro wie democra
Respondent	The property of the state of the second control of the second cont	CHEMICALS USA, 1	KONTY 5788 NOX 2007 LOVE NO 1.1100 NO. 1. 17.			S. Caratti sudise in Lie iter, ili e intri
Case ID No.		5/1 <b>2</b> /11/5/12/5				
Reg. Ent. Reference No.						
Regretim Kerenence No.				1	oper elabacie (p. 11) <b>ga</b> l	Years of
	<i>€</i> ;				Percent Interest	
Violation No.	10	Zanada sarangan ng mga				Depreciation
	A CONTRACTOR OF THE PROPERTY O	CARL STATES OF	LOUP TANKERS OF CO.		5.0	15
And the state of t	Item Cost	Date Required	Final Date	Yrs Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	The second secon			Printer and Alberta	North Bertarian (1994) Andrew (1994) North Stranger (1994)
or other son, our district material and an experience of the second	* LEST-THEMSITETINGSLATA	CONTRACTOR CONTRACTOR CONTRACTOR	See and the second of the second		**************************************	ent and the property chair shorter.
	Maria de la companya	STATE OF STREET				
Delayed Costs Equipment	30 126555 N.B.C. 1 or	8, 9,56, 1,5 °F 76 6.7 1 W		0.00 \$0	\$0	\$0
Buildings	28 1/08842, 308 m m d	Propies in Andreas		0.00 \$0	\$0	\$0
Other (as needed)	18 - 18-31 Av. 1	1013 He 1 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4		0.00   \$0	\$0	\$0
Engineering/construction	.6.28.28 × 13		1.246	0.00 \$ \$0	\$0	\$0
Land	is despitation			0.00	in/a	\$0
Record Keeping System	.#1,#2,#2 lbs\ 68	202 telekto 54 :		0.00 \$0	n/a	\$D
Training/Sampling	47、赤线数数子数1.2学			0.00 * 50 * 50	n/a	\$0
Remediation/Disposal	ger francisk) dat 2. 2008		(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	0.00	n/a	\$0
Permit Costs	<ul> <li>(5) (2) (2) (3) (3) (4)</li> </ul>	ACCEPTED TO THE	Statement Call house	0.00 \$ \$0	n/a	\$0
Other (as needed)	1997年1998年1985年1	AND CONTRACTOR OF THE PARTY OF	1001000 \$1000	0.00 \$0	n/a	÷ \$0
	* * * * * * * * * * * * * * * * * * *	PARK STREET, B. P.	The residue Service		*	
			il z pribis			
Notes for DELAYED costs	7-74-27-37-14	💮 🥶 i nis estimat	ed cost for this	violation is included with	violation no. 8	
		osulation with a skill common				
	A KINILIA P	[75][1] avoidod	caste bafara	entering item (except	far and Hima sizat	dod sostev
Avoided Costs				)		
Disposal Personnel	ar an early and an early	English Sales Sales	่ ⊢ั≱ล้อยตั⊗เล่นีย์ตัดแ เกลย์เกลย์	-0.00 \$0 0.00 \$ \$0	\$0 \$3 \$ \$0	\$ \$0 \$ \$0
Inspection/Reporting/Sampling	188 08 8 M of 98 98 9 98 9	City (all tops of the region of the		0.00	*** <b>*****</b>	\$0
Supplies/equipment	CM Dissiling rights use			0.00 \$ \$0	\$0	\$0
Financial Assurance [2]	Service of the	14 14 A 4 12 14 1	2. 3. 15 december 2002 1002	0.00 \$0 \$0	\$0	\$0
ONE-TIME avoided costs [3]	RARY TEN	2008.00. \$40.00.00.	Carour empresares	0.00 \$0	\$0	\$0
Other (as needed)	.55 ALASAG XX (C)	50.005.000.008889 1. R	r > birografiaki	0.00	913 9c ≥\$0	\$0
•	an life tin, ago in	ELECT STORY	no estradores	的智慧(1995)最高的 · 教育 · 13。	114 1 W	Same Afficial Control
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Notes for AVOIDED costs	la Grand	itwa e t to a la				
			e Aug 3 kgs Av.	II AMELLIA DE P		
		2 000 000 000 000 000 000 000 000 000 0	g	* 1 mg/* - mg/#12# 2 #127/25#1 75 - 752 1782 1782 1782	20.00 13 V 20 1 6 1 2 1 1 1	of gardining on Brid
					r	
Approx. Cost of Compliance		\$0		TOTAL		\$0

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Screening Date Respondent	11-Aug-2010 TOTAL PETROCHEMICALS US	Docket No. 201		PCW sion 2 (September 2002)
Case 1D No.	40180	sr, ma.		evision October 30, 2008
Reg. Ent. Reference No. Media [Statute]	Air			
Enf. Coordinator Violation Number				
Rule Cite(s)		C 11 E(h)(2)(E) and (a) and		
	Safety Code § 382,085(b),	.6.115(b)(2)(F) and (c), and FOP 0-01267; STC 28; and A	122.143(4); Tex. Health & Nr. Permit No. 54026, SC 1	
Violation Description	139159, resulted from the I the start-up of compressor C register any excess flow, th H2S and 1,711.50 of SO2 event could have been practices, the demonstral	ted emissions on May 1, 2010 Respondent failing to close the 2-200A. Since the gas flow more North and South Flares rela- for four hours and four minut prevented by better operation tions in 30 Tex. Admin: Code an affirmative defense were n	e filtrogen purge valves at neter was faulty and did not eased a total of 9,04 lbs of tes. Since this emissions nal and/or maintenance § 101 222 necessary to	
	ı anı		Base Penalty	\$10,000
>> Environmental, Proper	Harm			
Release OR Actual	Major Moderate	Minor X		-
Potential		Pe	rcent 25%	
>>Programmatic Matrix Falsification	Major Moderate	Minor	***************************************	
The state of the s		Pe	rcent 0%	·
		osed to insignificant amounts of p n or environmental receptors as a		Account of the Control of the Contro
Del Principal Appell Del Principal Del Del Del Del Del Del Del Del Del De				
		Adjust	ment \$7,500	
		Adjust	### \$7,500	\$2,500
Violation Events		Adjūst	######################################	}
	/iolation Events 1 1 = daily = weekiv		ment \$7,500	}
				\$2,500
Number of \ mark only one	daily weekly monthly duarterly semiannual annual single-event		mber of violation days	\$2,500
Number of \ mark only one	daily weekly monthly duarterly semiannual annual single event  One quarterly  ply 25.0%	y event is recommended?	mber of violation days	\$2,500
Number of \ mark only one with an x	daily weekly monthly duarterily semiannual single event  One quarteri	y event is recommended?  Reduction  NOV to EDPRP/Settlement Offer	mber of violation days	\$2,500
Number of \ mark only one with an x	daily weekly monthly counterly semiannual cannual Single event  One quarterly  ply 25:0% Before NOV  Extraordinary Ordinary x	y event is recommended?  Reduction NOV to EDPRP/Settlement Offer	mber of violation days	\$2,500
Number of \ mark only one with an x	daily weekly monthly x semiannual single event  One quarterly  Extraordinary Ordinary x  The Response	y event is recommended?  Reduction NOV to EDPRP/Settlement Offer	with the state of	\$2,500
Number of \ mark only one with an x	daily weekly monthly x semiannual single event  One quarterly  Extraordinary Ordinary x  The Response	Reduction NOV to EDPRP/Settlement Offer (mark with x) Indent completed correctly a I June 23, 2010, before the A	with the state of	\$2,500
Number of \ mark only one with an x	daily weekly monthly duarterly semiannual annual single event  One quarterl  Extraordinary Ordinary N/A The Respo	Reduction NOV to EDPRP/Settlement Offer (mark with x) Indent completed corrective an June 23, 2010, before the A	with the state of	\$2,500
Number of \ mark only one with an x  Good Faith Efforts to Com	daily weekly monthly duarterly semiannual annual single event  One quarterl  Extraordinary Ordinary N/A The Respo	Reduction NOV to EDPRP/Settlement Offer (mark with x) Indent completed correctly e and June 23, 2010, before the A	mber of violation days  Violation Base Penalty  actions for this August 6, 2010  Violation Subtota	\$2,500
Number of \ mark only one with an x  Good Faith Efforts to Com	daily weekly weekly supported by weekly weekly support weekly we one quarter weekly weekly weekly we one quarter weekly weekly we one quarter weekly weekly we one quarter weekly we well we weekly we one quarter we one quarter we we well we we we we we well we	Reduction NOV to EDPRP/Settlement Offer (mark with x) Indent completed corrective an June 23, 2010; before the A	with the state of	\$2,500 \$2,500 \$1,875 \$12,384

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## **Economic Benefit Worksheet** Respondent TOTAL PETROCHEMICALS USA, INC. Case ID No. 40180 Reg. Ent. Reference No. RN102457520 Media Air Years of Percent Interest Violation No. 11 Depreciation 5.0 15 Yrs Interest Saved Onetime Costs Item Cost Date Required Final Date EB Amount Item Description No commas or \$ Delayed Costs Equipment 0.01 \$1 Buildings 0.00 \$02 \$0 \$0 \$0 Other (as needed) 0.00 \$0 \$0 Engineering/construction -0.00 × × \$0 \$0 \$0 Land 0.00 n/a \$0 Record Keeping System 0.00 n/a \$0 Training/Sampling 0.00 n/a Remediation/Disposal 0.00 :\$0 Permit Costs 0.00 : \$0 Other (as needed) Estimated cost to repair the faulty flow meter and flare flow meter (\$1,500), and to conduct extensive training of personnel to prevent emissions events (\$1,000). The date required is the initial date of non-Notes for DELAYED costs compliance. The final date is the date compliance was achieved. ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs Disposal 0.00 . \$0% \$0 × \$0 Personnel 0.00 \$0 Inspection/Reporting/Sampling 0.00 \$0 \$0 \$0 Supplies/equipment 0.00 \$0 \$0. Financial Assurance [2] 0.00 \$0 \$0 ONE-TIME avoided costs [3] 0.00 \$0 \$0 Other (as needed) \$0 \$0 Notes for AVOIDED costs TOTAL

\$8

\$2,500

Approx. Cost of Compliance

## TOTAL PETROCHEMICALS USA, INC. 2010-1300-AIR-E

## Attachment 1

Within the Standard Deviation Report ("SDR") for the Period of January 1, 2009 through March 31, 2009, on February 13 and 23, 2009, the Respondent exceeded the pounds per hour ("lbs/hr") sulfur dioxide ("SO2") Maximum Allowable Emissions Rate Table ("MAERT") limits at several heater Emission Point Numbers ("EPNs") as detailed below, including Average values, Maximum values and Total Unauthorized Amount ("TUA") values in pounds ("lbs").

EPN	Permit#	MAERT (lbs/hr)	Event 2 (hours)	Event 3 (hours)	Avg (lbs/hr)	Max (lbs/hr)	TUA (lbs)
01ACU1H101	9194A	3.9	0	1	4.61	4.61	0.71
01VACTH301	9194A	2.82	0	1	3.31	3.31	0.49
01ACU1202A	3615	4.94	0	1	5.70	5.70	0.8
01ACU1202B	3615	4.94	0	1	5.87	5.87	0.93
10DEMEXH-4	8983A	2.15	О	1	3.01	3.01	0.86
10DEMEXH-2	8983A	1.83	0	1	3.20	3.20	1.37
17NHTHTRS	5694A	3.32	1	1	4.14	4.52	1.63
17REFHTRS	5694A	11.13	10	1	13.54	19.42	26.54

Within the SDR for the Period of April 1, 2009 through June 30, 2009, on May 28, 2009, and June 7, 2009, the Respondent exceeded the SO2 MAERT limits at several heaters as detailed below.

EPN	Permit#	MAERT (lbs/hr)	Event 3 (hours)	Avg (lbs/hr)	Max (lbs/hr)	TUA (lbs)
10DEMEXH-4	8983A	2.15	2	2.23	2.29	0.16
10DEMEXH-2	8983A	1.83	2	2.04	2.07	0.41
13UNIBH301	9193A	2.64	1	2.75	2.75	0.11
15SRUINCIN	9195A	37.80	2	43.71	45.88	11.81
17REFHTRS	5694A	11.13	2	12.74	12.88	3,21

Within the SDR for the Period of October 1, 2009 through December 31, 2009, on October 19, 2009, and November 3, 2009, the Respondent exceeded the SO2 MAERT limits at several heaters as detailed below.

EPN	Permit #	MAERT	Event 2	Event 3	Avg	Max	TUA
		(lbs/hr)_	(hours)	(hours)	(lbs/hr)	(lbs/hr)	(lbs)
01VACTH301	9194A	2.82	0	2	3.58	3.90	1.52
01ACU1202A	3615	4.94	O	2	5.92	6.41	1.96
01ACU1202B	3615	4.94	0	2	5.79	6.27	1.70
04BTXH-52	5694A	1.32	1	2	1.52	1.69	0.60
10DEMEXH-4	8983A	2.15	3	1	2.46	3.04	1.67
10DEMEXH-2	8983A	1.83	3	0	2.19	2.64	1.53
17NHTHTRS	5694A	3.32	1	2	4.07	4.50	2.25
17REFHTRS	5694A	11.13	1	2	14.55	15.97	10.26
52DHT2H-2A/I	3 2347	1.74	0	1	1.82	1.82	0.08

TOTAL SO<sub>2</sub> EXCEEDED:

148.79

158.78

70.59

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## Compliance History Report

AIR NEW SOURCE PERMITS

AIR NEW SOURCE PERMITS

Customer/Respondent/Owner-Operator:

Regulated Entity:

ID Number(s):

CN600582399 TOTAL PETROCHEMICALS USA, INC. Classification: AVERAGE

RN102457520 TOTAL PETRO CHEMICALS USA

PORT ARTHUR REFINERY

Classification; AVERAGE

Site Rating: 27.46

Rating: 3.56

43109

44046

STORMWATER	PERMIT	TXR15NF16
INDUSTRIAL AND HAZARDOUS WASTE	PERMIT	50074
INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXD065099160
INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION # (SWR)	30002
WASTEWATER	PERMIT	WQ0000491000
WASTEWATER	EPA ID	TX0004201
AIR NEW SOURCE PERMITS	REGISTRATION	51145
AIR NEW SOURCE PERMITS	EPA ID	PAL46
AIR NEW SOURCE PERMITS	REGISTRATION	51146
AIR NEW SOURCE PERMITS	REGISTRATION	92262
AIR NEW SOURCE PERMITS	EPA ID	PSDTX1005
AIR NEW SOURCE PERMITS	PERMIT	N044
AIR NEW SOURCE PERMITS	REGISTRATION	93152
AIR NEW SOURCE PERMITS	PERMIT	2347
AIR NEW SOURCE PERMITS	PERMIT	3615
AIR NEW SOURCE PERMITS	REGISTRATION	11273
AIR NEW SOURCE PERMITS	PERMIT	16840
AIR NEW SOURCE PERMITS	PERMIT	5694A
AIR NEW SOURCE PERMITS	PERMIT	8983A
AIR NEW SOURCE PERMITS	PERMIT	9195A
AIR NEW SOURCE PERMITS	PERMIT	9194A
AIR NEW SOURCE PERMITS	PERMIT	9193A
AIR NEW SOURCE PERMITS	PERMIT	17352
AIR NEW SOURCE PERMITS	PERMIT	17920
AIR NEW SOURCE PERMITS	PERMIT	18936
AIR NEW SOURCE PERMITS	PERMIT	19490
AIR NEW SOURCE PERMITS	PERMIT	19965
AIR NEW SOURCE PERMITS	PERMIT	20381
AIR NEW SOURCE PERMITS	REGISTRATION	35330
AIR NEW SOURCE PERMITS	REGISTRATION	35329
AIR NEW SOURCE PERMITS	REGISTRATION	36873
AIR NEW SOURCE PERMITS	REGISTRATION	41280

PERMIT

REGISTRATION

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AIR NEW SOURCE PERMITS	REGISTRATION	45378
AIR NEW SOURCE PERMITS	REGISTRATION	46060
AIR NEW SOURCE PERMITS	PERMIT	46396
AIR NEW SOURCE PERMITS	REGISTRATION	47520
AIR NEW SOURCE PERMITS	REGISTRATION	48600
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	JE0005H
AIR NEW SOURCE PERMITS	PERMIT	49136
AIR NEW SOURCE PERMITS	PERMIT	54026
AIR NEW SOURCE PERMITS	REGISTRATION	54742
AIR NEW SOURCE PERMITS	REGISTRATION	84487
AIR NEW SOURCE PERMITS	REGISTRATION	55151
AIR NEW SOURCE PERMITS	REGISTRATION	55631
AIR NEW SOURCE PERMITS	REGISTRATION	55916
AIR NEW SOURCE PERMITS	PERMIT	55684
AIR NEW SOURCE PERMITS	REGISTRATION	75532
AIR NEW SOURCE PERMITS	REGISTRATION	75523
AIR NEW SOURCE PERMITS	AFS NUM	4824500037
AIR NEW SOURCE PERMITS	EPA ID	PSDTX058
AIR NEW SOURCE PERMITS	EPA ID	PSDTX688
AIR NEW SOURCE PERMITS	PERMIT	56385
AIR NEW SOURCE PERMITS	REGISTRATION	56735
AIR NEW SOURCE PERMITS	REGISTRATION	71547
AIR NEW SOURCE PERMITS	REGISTRATION	71654
AIR NEW SOURCE PERMITS	REGISTRATION	71651
AIR NEW SOURCE PERMITS	REGISTRATION	71559
AIR NEW SOURCE PERMITS	REGISTRATION	70700
AIR NEW SOURCE PERMITS	REGISTRATION	55129
AIR NEW SOURCE PERMITS	REGISTRATION	56248
AIR NEW SOURCE PERMITS	REGISTRATION	54086
AIR NEW SOURCE PERMITS	REGISTRATION	55072
AIR NEW SOURCE PERMITS	REGISTRATION	53687
AIR NEW SOURCE PERMITS	REGISTRATION	72471
AIR NEW SOURCE PERMITS	REGISTRATION	72930
AIR NEW SOURCE PERMITS	REGISTRATION	73221
AIR NEW SOURCE PERMITS	REGISTRATION	72436
AIR NEW SOURCE PERMITS	REGISTRATION	52593
AIR NEW SOURCE PERMITS	REGISTRATION	73844

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AIR NEW SOURCE PERMITS	REGISTRATION	73787
AIR NEW SOURCE PERMITS	REGISTRATION	73928
AIR NEW SOURCE PERMITS	REGISTRATION	74442
AIR NEW SOURCE PERMITS	REGISTRATION	74505
AIR NEW SOURCE PERMITS	REGISTRATION	74611
AIR NEW SOURCE PERMITS	REGISTRATION	74767
AIR NEW SOURCE PERMITS	REGISTRATION	73890
AIR NEW SOURCE PERMITS	REGISTRATION	73885
AIR NEW SOURCE PERMITS	REGISTRATION	75106
AIR NEW SOURCE PERMITS	REGISTRATION	75367
AIR NEW SOURCE PERMITS	REGISTRATION	75091
AIR NEW SOURCE PERMITS	EPA ID	PSDTX688M1
AIR NEW SOURCE PERMITS	EPA ID	PSDTX762M1
AIR NEW SOURCE PERMITS	REGISTRATION	76788
AIR NEW SOURCE PERMITS	EPA ID	PSDTX762M2
AIR NEW SOURCE PERMITS	EPA ID	PSDTX762M3
AIR NEW SOURCE PERMITS	REGISTRATION	78538
AIR NEW SOURCE PERMITS	EPA ID	PSDTX1073
AIR NEW SOURCE PERMITS	REGISTRATION	80728
AIR NEW SOURCE PERMITS	REGISTRATION	81517
AIR NEW SOURCE PERMITS	EPA ID	PSDTX762
AIR NEW SOURCE PERMITS	REGISTRATION	90674
AIR NEW SOURCE PERMITS	EPA ID	PSDTX1073M1
AIR NEW SOURCE PERMITS	REGISTRATION	91082
AIR NEW SOURCE PERMITS	REGISTRATION	91247
AIR NEW SOURCE PERMITS	REGISTRATION	84507
AIR NEW SOURCE PERMITS	REGISTRATION	54827
AIR NEW SOURCE PERMITS	REGISTRATION	91045
AIR NEW SOURCE PERMITS	REGISTRATION	83832
AIR NEW SOURCE PERMITS	REGISTRATION	85036
AIR NEW SOURCE PERMITS	REGISTRATION	84944
AIR NEW SOURCE PERMITS	REGISTRATION	47047
AIR NEW SOURCE PERMITS	REGISTRATION	87865
AIR NEW SOURCE PERMITS	PERMIT	91257
AIR NEW SOURCE PERMITS	EPA ID	PSDTX453M6
AIR NEW SOURCE PERMITS	REGISTRATION	72108
AIR NEW SOURCE PERMITS	REGISTRATION	51719
AIR NEW SOURCE PERMITS	REGISTRATION	51263
AIR NEW SOURCE PERMITS	REGISTRATION	90747

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AIR OPERATING PERMITS

ACCOUNT NUMBER

JE0005H

AIR OPERATING PERMITS

**PERMIT** 

1267

AIR OPERATING PERMITS

PERMIT

2222

PUBLIC WATER SYSTEM/SUPPLY

REGISTRATION

1230048

WASTEWATER LICENSING

LICENSE

WQ0000491000

WATER LICENSING

LICENSE

1230048

AIR EMISSIONS INVENTORY

ACCOUNT NUMBER

JE0005H

Location:

7600 32ND ST, PORT ARTHUR, TX, 77642

TCEQ Region:

**REGION 10 - BEAUMONT** 

Date Compliance History Prepared:

September 16, 2010

Agency Decision Requiring Compliance History: Enforcement

Compliance Period:

September 15, 2005 to September 16, 2010

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

Audra Benoit

Phone:

(409) 899-8799

## Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period?

2. Has there been a (known) change in ownership/operator of the site during the compliance period?

Yes Fina Oil & Gas Chemical Co.

3. If Yes, who is the current owner/operator?

OWN

N/A

**OWNOPR** 

American Petrofina Holding Company

OWNOPR

Fina Oil and Chemical Company

OWNOPR

TOTAL PETROCHEMICALS USA, INC.

4. If Yes, who was/were the prior owner(s)/operator(s)? .

**OWNOPR** 

Atofina PAR L.P.

N/A

N/A

5. When did the change(s) in owner or operator occur?

06/29/2007

OWNOPR

Atofina PAR L.P.

6. Rating Date: 9/1/2010 Repeat Violator:

## Components (Multimedia) for the Site:

A. Final Enforcement Orders, court judgments, and consent decrees of the State of Texas and the federal government.

Effective Date: 05/25/2007

ADMINORDER 2006-1095-AIR-E

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to notify the agency within 24 hours of the discovery of an emissions event.

Classification: Major

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: 16840 and PSD-TX-688M2 PERMIT

Description: Failure to prevent an unauthorized emissions release at the facility.

Classification: Major

30 TAC Chapter 116, SubChapter B 116,115(b)(2)(F)

5C THC Chapter 382, SubChapter D 382,085(b)

Rgmt Prov: 18936/PSD-TX-762M2 PERMIT

Description: Failure to maintain the VOC emission rate below 7.56 lb/hr at the FPM Cooling Tower during the time described by Incident No. 71740.

Effective Date: 10/23/2008 ADMINORDER 2007-1427-AIR-E

Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.340

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 56385, Special Condition 12E PERMIT

56385, Special Condition 15 PERMIT O-01267, General Terms and Conditions OP

O-01267, Special Condition 1A OP O-01267, Special Condition 27 OP

Description: Failure to operate with a cap, blind flange, plug, or a second valve installed on equipment in

VOC service. EIC C10, MIN (3)(D)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: 56385, Special Condition 4 PERMIT

56385, Special Condition 5 PERMIT

O-01267, General Terms and Conditions OP

O-01267, Special Condition 27 OP

Description: Failure to comply with the conditions of a permit. EIC B18. MOD (2)(D)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 46396, Special Condition 8F PERMIT

O-01267, General Terms and Conditions OP

O-01267, Special Condition 27 OP

Description: Failure to maintain a tank's exterior surface as white or aluminum. EIC B19g.(1) MOD (2)(G)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: 49743, Special Condition 8 PERMIT

O-01267, General Terms and Conditions OP

O-01267, Special Condition 27 OP

Description: Failure to maintain permitted loading limit as found in permit. MOD (2)(G) EIC B19g.(1)

Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.340

30 TAC Chapter 115, SubChapter D 115.354(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382,085(b)

Rgmt Prov: 56385, Special Condition 12F PERMIT

56385, Special Condition 15 PERMIT O-01267, General Terms and Conditions OP

O-01267, Special Condition 1A OP O-01267, Special Condition 27 OP

Description: Failure to conduct fugitive monitoring on components. MIN (3)(A), EIC C1

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(d)

5C THC Chapter 382, SubChapter D 382.085(b)

. Rqmt Prov: O-01267, General Terms and Conditions OP

O-01267, Special Condition 1A OP

Description: Failure to replace immediately with fresh carbon when carbon breakthrough was indicated

by monitoring. MOD (2)(G), EIC B18

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.695(a)(3)(ii)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 56385, Special Condition 13 PERMIT

O-01267, General Terms and Conditions OP

O-01267, Special Condition 1A OP O-01267, Special Condition 27 OP

Description: Failure to replace immediately with fresh carbon when carbon breakthrough was indicated

by monitoring on canisters. MOD (2)(G), EIC B18

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01267, General Terms and Conditions OP

Description: Failure to obtain permit authorization for four carbon canisters. MOD (2)(D), EIC A2.a

Classification: Minor

Citation: 30 TAC Chapte

30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.340 30 TAC Chapter 115, SubChapter D 115.352(2) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 19965, Special Condition 2 PERMIT

19965, Special Condition 5H PERMIT O-01267, General Terms and Conditions OP

O-01267, Special Condition 1A OP O-01267, Special Condition 27 OP

Description: Failure to repair leaking components within 15 days after the leak was discovered. MOD

(2)(G) EIC C4

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115,114(a)(4)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01267, General Terms and Conditions OP

O-01267, Special Condition 1A OP

Description: Failure to conduct a visual inspection at least once every six months on an external floating

roof tank. MOD(2)(E), EIC B1

Classification: Moderate

Gitation: 30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(A) 30 TAC Chapter 122, SubChapter B 122.146(5)(D) 5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: O-01267, General Terms and Conditions OP

Description: Failure to report the occurrence of deviations in semi-annual deviation reports and

accurately certify an annual compliance certification. MOD (2)(B), EIC B3

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: 18936 and PSD-TX-762M2, GC 8 PERMIT

O-01267, General Terms and Conditions OP O-01267, Special Condition (SC) 27 OP

Description: Failure to maintain permitted Carbon monoxide (CO) emissions rate for the FCCU

Regenerator Stack. MOD (2)(D) EIC A8c(2)(A)(ii) Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) Rqmt Prov: 2347, SC 10 PERMIT O-01267, General Terms and Conditions OP O-01267, SC 27 OP Description: Failure to conduct compliance testing within sixty days after start-up of four heaters at the refinery. MOD (2)(A) EIC A8c(1)(G) Classification: Moderate Citation: 30 TAC Chapter 106, SubChapter A 106.6(b) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: 56385, SC 1 PERMIT O-01267, General Terms and Conditions OP O-01267, SC 27 OP Description: Failure to maintain allowable emissions rates. MOD (2)((D) EIC A8c((2)(A)(ii) Classification: Moderate Citation: 30 TAC Chapter 106, SubChapter U 106.472 30 TAC Chapter 115, SubChapter B 115.112(a)(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: O-01267, General Terms and Conditions OP O-01267, SC 4 OP Description: Failure to obtain permit authorization and properly control VOC emissions from two spent acid tanks. MOD (2)(D) EIC A2.a Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101,20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116,115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382,085(b) Rqmt Prov: 18936 and PSD-TX-762M2, GC 8 PERMIT O-01267, General Terms and Conditions OP O-01267, SC 27 OP Description: Failure to maintain allowable emissions rates. MOD (2)(D) EIC A8c(2)(A)(ii) Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116,115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: 2347, SC 1 PERMIT O-01267, General Terms and Conditions OP O-01267, SC 27 OP Description: Failure to maintain allowable emissions rates. MOD (2)(D) EIC A8c(2)(A)(ii) Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: 9195A and PSD-TX-453M6, SC 1 PERMIT O-01267, General Terms and Conditions OP O-01267, SC 27 OP Description: Failure to maintain an allowable emissions limit. MOD (2)(D) EIC A8.c.(2)(A)(ii)

Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101,20(1)
30 TAC Chapter 101, SubChapter A 101,20(3)
30 TAC Chapter 113, SubChapter C 113,780
30 TAC Chapter 116, SubChapter B 116,115(c)

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30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: 9195A and PSD-TX-453M6, SC 3 PERMIT

O-01267, General Terms and Conditions OP

O-01267, SC 1A OP O-01267, SC 27 OP

Description: Failure to limit the discharge of any gases into the atmosphere to 250 ppm by volume (dry basis) of SO2 at zero % excess air, from any Claus Sulfur Recovery plant. MOD (2)(D), EIC A8c.(1)(B)

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01267, General Terms and Conditions OP O-01267, Special Condition 2F OP

Description: Failure to report the initial notification as soon as practical, but no later than 24-hours after

the discovery of an emissions event. MIN (3)(C), EIC C3

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: 16840 and PSD-TX-688M2, GC 1 PERMIT

O-01267, General Terms and Conditions OP

O-01267, Special Condition 27 OP

Description: Failure to maintain an emission rate below the allowable emission limit. MOD (2)(D), EIC

A8c.(2)(A)(ii)

Effective Date: 11/06/2008

ADMINORDER 2008-0243-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: 1267, General Terms and Conditions OP

1267, Special Condition 27 OP 54026, Special Condition 1 PERMIT

Description: Failed to comply with the South Flare (EPN 53SOUTHFLR) MAER for SO2 on March 30, 2007. Specifically, the MAER is 10.66 lbs/hr. During the event which lasted one hour 15 minutes, the South Flare released 898.80 lbs of SO2, resulting in 885.47 lbs of unauthorized emissions. Since these emissions could have been foreseen and avoided by good operating practices, the demonstrations for an affirmative defense in 30 TEX. ADMIN. CODE § 101.222 were not met. EIC A8(c)(2)(A)(ii) MOD(2)(D)

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 113, SubChapter C 113.340 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 20381, PSD-TX-1005, N-044, SC 7E PERMIT

O-02222, Special Condition 14 OP

Description: Failed to seal two open-ended lines, identified as Tag No. 01336 on the 40E-7A vessel and Tag No. 40,01668 located near pressure control valve PC 487, with a cap, plug, or blind flange. MIN (3) (C), EIC C10

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 115, SubChapter B 115.114(a)(4)

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30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20381, PSD-TX-1005, N-044, SC 6 PERMIT

O-02222, Special Condition 14 OP O-02222, Special Condition 1A OP

Description: Failed to conduct inspections of external floating roof tanks once every six months.

Specifically, in 2006, Tank Nos. 800, 801, 802, and 805 were inspected only once in November, and Tank

Nos. 800 and 802 were not inspected during the first six months of 2007. MOD (2)(E), EIC B1

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122,143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(A)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: O-02222, General Terms and Conditions OP

Description: Failed to report the occurrence of all deviations in the semi-annual deviation report. Specifically, failed to include failure to conduct tank inspections during the first six months of 2006 in the May 14, 2006 -November 13, 2006 semiannual deviation report and failed to include an exceedance of the Condensate Splitter Heater firing rate during a recordable shutdown/startup activity that occurred on November 14 and 15, 2006 in the November 14, 2006 - May 13, 2007 report. MOD (2)(B), EIC B3

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 106, SubChapter K 106.261(a)(2)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

t Drove 0.02222 Charlet Condition 44 CD

Rqmt Prov: 0-02222, Special Condition 14 OP

20381, PSD-TX-1005, N-044, SC 1 PERMIT O-02222, General Terms and Conditions OP

PBR Registration 74442 PERMIT

Description: Failed to comply with the Condensate Splitter Heater combined SO2 maximum allowable emission rate ("MAER") of 6.08 lbs/hr. Specifically, on February 2, 2007 from 17:00 through 20:00, the rate varied from 7.16 to 11.33 lbs/hr, on February 21, 200 at 19:00 was 7.37 lbs/hr, on March 14, 2007 at 20:00 was 6.30 lbs/hr, and April 14, 2007 at 20:00 was 8.68 lbs/hr. MOD (2)(D), EIC A8c.(2)(A)(ii) (Violation incorrectly cited as 106.261(2) in Order.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: 1267, General Terms and Conditions OP

1267, Special Conditon 27 OP

## 54026, Special Condition 1 PERMIT

Description: Failed to comply with the South Flare MAER for SO2, H2S, and NOx. Specifically, the MAERs for SO2, H2S, and NOx are 10.66 lbs/hr, 0.12 lbs/hr, and 32.99 lbs/hr, respectively. During the event which lasted one hour 20 minutes, the South Flare released 604.33 lbs of SO2, 6.60 lbs of H2S, and 65.00 lbs of NOx, resulting in unauthorized emissions of 590.12 lbs of SO2, 6.44 lbs of H2S, and 21.01 lbs/NOx. The demonstrations for an affirmative defense in 30 TEX. ADMIN. CODE § 101.222 were not met.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: 1267, General Terms and Conditions OP

1267, Special Condition 2F OP

Description: Failed to submit final reports within two weeks after the end of reportable emissions events. Specifically, the final reports for the emissions events which occurred on August 17 and 29, 2007 should have been submitted by August 31 and September 12, 2007, respectively, but were not submitted until September 7 and 16, 2007, respectively. EIC C(3) MIN(3)(C)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

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Rqmt Prov: 1267, General Terms and Conditions OP

1267, Special Condition 27 OP 54026, Special Condition 1 PERMIT

Description: Failed to comply with the SO2 MAER for the North & South Flares on August 17 and 29, 2007. The North Flare (EPN 41NORTHFLR) and South Flare have a total combined rate of 10.66 lbs of SO2 per hour. NSRP No. 54026 does not allow any emissions from the Sulfur Recovery Unit 3 ("SRU-3") Reactor. During an emissions event that lasted 9 hours and 35 minutes on August 17, the North Flare released a total of 4,138.74 lbs of SO2, of which 4,036.62 lbs were unauthorized. EIC A8(c)(2)(A)(ii) MOD(2)(D)

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101,201(b)(1)(H)

30 TAC Chapter 101, SubChapter F 101,201(c)

5C THSC Chapter 382 382,085(b)

Description: Failed to submit the final report within two weeks after the end of a reportable emissions event and to include the proper authorization limits in the report. Specifically, the final report for the emissions event which occurred on August 1, 2007 should have been submitted by August 15, 2007, but was not submitted until August 20, 2007 and had the wrong H2S limit listed.

Effective Date: 11/17/2008

ADMINORDER 2008-0726-AIR-E

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

Rgmt Prov: 1267, General Terms and Conditions OP

1267, Special Condition 2.(F) OP

Description: Failure to report emission events timely.

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THSC Chapter 382 382.085(b)

Rgmt Prov: 49743, Special Condition 1 PERMIT

Description: Failure to prevent the release of unauthorized contaminants into the atmosphere.

Effective Date: 03/23/2009

ADMINORDER 2008-1382-AIR-E

Classification: Moderate

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.146(2)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: General Terms and Conditions OP

Description: Failure to submit an Annual Compliance Certification (ACC) no later than 30 days after the

end of the reporting period.

Effective Date: 04/05/2009

ADMINORDER 2008-0989-AIR-E

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 54026, SC 5D PERMIT

O-01267, SC 27 OP

Description: Failed to install analyzers which provide a record of the vent stream flow and composition on three flares, North, South, and Middle Flares, Unit Identification Nos. 41NORTHFLR, 53SOUTHFLR, and 41MIDFLARE. Specifically, the Respondent failed to install the analyzers within eighteen months of the permit issuance date of October 8, 2003. The analyzers should have been installed by April 10, 2005. MOD (2)(A) EIC B1

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c)

• ,  30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 56385, SC 3 PERMIT O-01267, SC 27 OP

Description: Failed to maintain the food-to-microorganisms (F/M) ratio on the Enhanced Biodegradation Unit Aeration Tanks A, B, and C. Specifically, the Respondent failed to maintain the F/M ratio in the range of 0.05 to 1.0 kilograms of Biochemical Oxygen Demand per kilogram of biomass per day from September 1, 2006 through November 21, 2006. MOD (2)(G) EIC B19g.(1)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: 18936 and PSD-TX-762M2, GC 8 PERMIT

O-01267, SC 27 OP

Description: Failed to maintain allowable emissions rates. Specifically, the Respondent exceeded its tons per year limit. The permit limits Tank 589 to 0.31 tons per year ("tpy") of VOC and the Respondent reported emissions of VOCs for Tank 589 to be 0.3312 tpy during 2005. MOD (2)(D) EIC B18

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116,115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: 2347, Special Condition 1 PERMIT

2347, Special Condition 3 PERMIT O-01267, Special Condition 27 OP

Description: Failed to comply with permitted NOx and PM emission limits for the 805 Charge Heater Stack (EPN 51DHT1H-1). Specifically, stack tests conducted on August 21, 2007 recorded emissions of an average of 3.16 lbs/hr of NOx, 0.043 lbs per MMBtu of NOx, and 2.61 lbs/hr of PM. The stack tests conducted on August 24, 2007 recorded emissions of an average of 0.72 lbs/hr of PM. The permitted emission limits for the 805 Charge Heater are 2.52 lbs/hr NOx, 0.47 lbs/hr PM, and 0.035 lbs/MMBtu of NOx.

Effective Date: 07/20/2009 ADMINORDER 2007-0172-AIR-E

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

30 TAC Chapter 101, SubChapter F 101.201(b)(8) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to properly report three emissions events which began on December 9, 2003, at 6:25 p.m. from the SRU 1, Distillate Hydrotreater 2, and Amine Treater. The three incident reports were submitted more than 24 hrs after the discovery of the incidents. In addition, the report for SRU 1, listed an incorrect air permit number for the SRU and North Flare.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to properly report two emissions events which began on December 9, 2003, at the North and South Flares. The reports for both flares had incorrect air permit numbers on them.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(i)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 54026 PERMIT

Permit No. 9195A/PSD-TX-453M6 SC 1 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions from the North Flare, South Flare, Distillate Hydrotreater No. 2, SRU 1, and Amine Treater during the time period of December 9, 2003 through December 14, 2003.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

30 TAC Chapter 101, SubChapter F 101.201(b)(10)

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5C THC Chapter 382, SubChapter A 382.085(a)

Description: TOTAL has failed to properly report an emissions event that occurred at the Area 1 NAC which began on November 9, 2003. The event was not reported within 24 hrs, and the cause of the event was not complete in the report.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: 54026, Special Condition 1 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions from the South Flare on November 9, 2003. During the event at the Area 1 NAC, the Flare Gas Recovery System was down so that emissions were routed to the South Flare which exceeded the maximum allowable emission limits of 32.99 and 10.66 lbs/hr for SO2, and NOx, respectively. During the incident, the South Flare released 6,785.7 lbs of SO2, and 169 lbs of NOx.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 54026, Special Condition 1 PERMIT

9195A, Special Condition 1 PERMIT

PSD-TX-453M6 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions release from the SCOT Tailgas Incinerator and North Flare on October 16, 2003 when an operator inadvertently closed a fuel gas supply control valve to the SCOT unit. The SCOT Tailgas Incinerator has emissions limits of 38.0 and 1.88 lbs/hr for SO2 and H2S, respectively. During an 8.5 hr period, from noon to 8:30 p.m. the incinerator released 6,735 ibs of SO2 and 100 lbs of H2S. The North Flare has an emission limit of 10.66 lbs/hr for SO2. D

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 9195A/PSD-TX-453M6 PERMIT

Description: TOTAL has failed to maintain the minimum flame temperature at the SRU Thermal Reactor

[EPN F310] when processing sour water stripping gas. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 9195A/PSD-TX-453M6, Special Condition 6 PERMIT

Description: TOTAL has failed to maintain a minimum sulfur recovery efficiency of at least 99.9% at SRU

I and SRU II on January 14-18, 23, and March 8-10, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 17352, Special Condition 4C PERMIT

Description: TOTAL has failed to replace spent canister media within five days after breakthrough was detected on December 16, 2003, in the three activated carbon canisters in which emissions from tanks 300, 302, 303, and 310-315 are routed through. On December 16, 2003, H2S breakthrough was discovered at the canisters. However, the spent media was replaced 6 days later.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 18936/PSD-TX-762M2, Special Condition 8 PERMIT

Description: TOTAL has failed to maintain an emission limit below the maximum allowable concentration for NOx and SO2 at the FCCU flue gas vent (EPN 55RGNFLUGS).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 43109, Special Condition 3A PERMIT

Description: TOTAL has failed to maintain the NOx emission limit below the allowable hourly average for Boilers 300 (EPN 61STKBLR) and 350 (EPN 61STKBLR) during the time period from January 7 to February 28, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 46396, Special Condition 5B PERMIT

Description: TOTAL has failed to conduct proper maintenance at the Tank 926 Flare (EPN 22TK926FLR)

and the Benzene Tank Flare (EPN 50BZTNKFLR) from January 2003 to April 2004.

Classification: Moderate

Citation: 5C THSC Chapter 382 382.085(b)
Rqmt Prov: Standard Exemption 106 PERMIT

Description: TOTAL has failed to maintain a firing rate of 63 MMBtu/hr or less at the BTX Heater H-52 on

February 3 and 4, 2004. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: 54026 PERMIT

9195A/PSD-TX-453M6 PERMIT

Description: TOTAL has failed to maintain an emission rate below the maximum allowable emission rates for the Tailgas Thermal Oxidizer (EPN 125) and the North Flare (5) (EPN 41NORTHFLR) on April 28, 2004.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7)

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL failed to properly report an emissions event which occurred on June 21, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(a)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: Permit No. 18936/PSD-TX-762M2 PERMIT

Description: TOTAL has failed to maintain an emission rate below the maximum allowable emission rate for the South Flare (EPN 142) and to prevent unauthorized emissions from the C-200 Sour Fuel Gas Compressor on June 20-21, 2003.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7)

30 TAC Chapter 101, SubChapter F 101,201(b)(8) 5C THC Chapter 382, SubChapter A 382,085(b)

Description: TOTAL has failed to properly report an emission event which occurred on February 25-27, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 18936 and PSD-TX-762M2 PERMIT

Description: TOTAL has failed to maintain an emission rate below the maximum allowable emission rate for the South Flare (EPN 142) during intermittent lifting of the safety relief valve on C-1A&B at the Atmospheric Crude Unit No. 1 from February 25-27, 2003.

Classification: Minor

on: 30 TAC Chapter 101, SubChapter F 101.201(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to satisfy the final reporting requirements for a reportable emission event which occurred on February 27, 2003.

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)

Description: TOTAL has failed to prevent the unauthorized release of 14.55 lbs of benzene into the

atmosphere from a leak in the inlet line to the T-4 Recovery Tower on February 27, 2003.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to satisfy the final reporting requirements for a reportable emissions event which occurred on May 1-3, 2003.

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)

Description: TOTAL failed to prevent the release of unauthorized benzene emissions from a pinhole leak

on the level bridle of the Depentanizer Overhead Drum on May 1-3, 2003.

Classification: Minor

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Citation: 30 TAC Chapter 101, SubChapter F 101,201(a)(1)(B)

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D) 5C THC Chapter 382, SubChapter A 382,085(b)

Description: TOTAL has failed to properly notify the regional office of a reportable emissions event

which occurred on July 17, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)

5C THSC Chapter 382 382.085(a)

Rqmt Prov: 18936/PSD-TX-762M2 PERMIT

Description: TOTAL has failed to maintain an emission rate below the maximum allowable emission rate for the South Flare (EPN 142) and failed to prevent unauthorized emissions from the Sour Water Stripper 2 line during the emissions event on July 17, 2003.

Classification; Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter A 382,085(b)

Description: TOTAL has failed to properly report an emissions event at Compressor C-301 at the ACU-2 unit which began on December 22, 2003, and ended on December 23, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 54026, Special Condition 1 PERMIT

Description: TOTAL has failed to maintain an emission rate below the maximum allowable emission rates

for the North Flare (5) (EPN 41NORTHFLR) on December 22-23, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(a)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: PSD-TX-453M6, SC 2 PERMIT

Description: TOTAL has failed to comply with the emission limitations at the UNIBON Heater

(EPNUNIBH301) and failed to prevent unauthorized emissions at the Area 1 Resid Processing Complex on February 23-26, 2004, when a valve on the startup line between the heater and V-7 was left open.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101,201(b)

5C THSC Chapter 382 382.085(b)

Description: TOTAL has failed to properly report an emissions event that occurred at NGL Sphere 848

on March 16-17, 2004. Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)

Description: TOTAL has failed to prevent the unauthorized release of ten lbs of benzene from NGL

Shpere 848 on March 16-17, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 9193A/PSD-TX-453M6, MAERT PERMIT

Description: TOTAL has failed to maintain an emission rate below the allowable for the North Flare (EPN 307), which is for emergency use only, limiting the amount of emissions to a rate of zero during non-emergency operations - SSM activities, during an emissions event which began on February 8,

2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 54026, SC 1 PERMIT

Description: TOTAL has failed to prevent unauthorized emission releases. Two emissions events occurred respectively on July 14 and July 22, 2004, at EPN 41NORTHFLARE, with respective durations of 53.33 and 14.97 hrs, emitting significant quantities of SO2 and H2S.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20

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30 TAC Chapter 111, SubChapter A 111.111(a)(4)
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30 TAC Chapter 113, SubChapter C 113,100

30 TAC Chapter 113, SubChapter C 113,340

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 54026, SC 4 PERMIT

54026, SC 5C PERMIT

Description: TOTAL has failed to properly operate EPN 53SOUTHFLR. During an 18 min time period beginning at 15:45 on July 23, 2004, EPN 53SOUTHFLR smoked for a period of six min and two seconds.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: 18936/PSD-TX-762M2 PERMIT

Description: TOTAL has failed to maintain an emission rate below the allowable rate for the South Flare (EPN 142) during an emissions event which started on September 21, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: 9193A/PST-TX-453M6 PERMIT

Description: TOTAL has failed to maintain an emission rate below the allowable for the North Flare (EPN 307), which is for emergency use only, limiting the amount of emissions to a rate of zero during non-emergency operations - SSM activities. Two such events began on August 16 and September 21, 2003, respectively.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to properly notify the TCEQ Regional Office within 24 hrs of the reportable emissions events of February 8 - 22, 2003, with respect to EPN 307 and the reportable emission events of September 21, 2003, with respect to EPNs 307 and 142.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.211(b)(8)

30 TAC Chapter 101, SubChapter F 101.211(b)(9) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to submit a final record containing a compound descriptive type of all individually listed compounds to have been released during SSM activity, their estimated total quantities, and the authorized emissions limits for applicable compounds. Twenty-five incomplete final reports were submitted or missing for emissions event occurring between December 31, 2003, and August 18, 2004. Note that some emissions events had two such reports, one for VOC and one for other emissions.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.211(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Description: TOTAL has failed to submit a final record no later than two weeks after the end of the scheduled SSM activity. The plant failed to submit a final records as required for an emissions event which began January 30, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 54026, Special Condition 1 PERMIT

Description: TOTAL has failed to maintain an emission rate below the allowable limits. There are 16 emissions events between December 31, 2003, and August 18, 2004, which exceeded the MAERT.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 9195A/PSD-TX-453M6, Special Condition 1 PERMIT

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Description: TOTAL has failed to maintain an emission rate below the allowable limit on December 31, 2003, when EPN 41NORTHFLR released 27,704.51 lbs of SO2 for 4.55 hrs in excess of its 4.13 lbs/hr limit; CO, NOx and VOC emissions were not reported.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 43109, Special Condition 1 PERMIT

Description: TOTAL has failed to maintain an emission rate below the permitted limit. The SCOT Tailgas Incinerator (EPN 125) had the following unauthorized emission event releases in excess of the MAERT limit of 38 lbs/hr for SO2 and 1.88 lbs/hr for H2S: on May 23, 2004, during a 2 hr and 22 min period, 93.49 lbs of H2S and 9,380 lbs of SO2.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit No. 9195A/PSD-TX-453M6 PERMIT

Description: TOTAL has failed to maintain an emission rate below the permitted limit. The SCOT Tailgas Incinerator (EPN 125) had the following unauthorized emission events in excess of the MAERT limit of 38 lb/hr for SO2 and 1.88 lb/hr for H2S: on April 1, 2004, during a 5 hr and 5 min period, 211.65 lb of H2S and 21,036 lb of SO2.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)

30 TAC Chapter 101, SubChapter F 101.201(b)(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to properly notify the TCEQ Regional Office of the reportable emissions event of August 16 - 17, 2003, on two occasions with respect to EPN 307.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(10)

30 TAC Chapter 101, SubChapter F 101.201(b)(4) 30 TAC Chapter 101, SubChapter F 101.201(b)(7) 30 TAC Chapter 101, SubChapter F 101.201(b)(8) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to properly submit a final record for 24 emission events with respect to common name of area, complete identification and quantification of emitted compounds, or related limits: 10 which began on January 26, February 12, March 26 and 28, and April 11, 21, 22 (two reports), and 28, 2004, respectively; another five reports for emissions events beginning on July 14; and ten other reports for events beginning on July 22, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 18936/PSD-TX-762M2, General Condition 8 PERMIT

Description: TOTAL has failed to prevent unauthorized emission releases. Beginning on January 26, 2004, (EPN) 55RGNFLUGS at the FCCU released 13,491.01 lbs of CO in excess of limits and 12,714.71 lbs of SO2 in excess of limits, intermittently for 72 hrs during a 356 hr period; no information available on the amount of PM released.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to prevent unauthorized emissions releases. Eleven emissions events occurred between February 12 and July 23, 2004, during which SO2, H2S, VOCs, CO, and NOx from EPNs 41NORTHFLARE, 53SOUTHFLR, or 53MIDFLARE.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit No. 49743 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions above permitted limits. Specifically, on

October 15, 2004, EPN 22TANK0475 at Tank 475 released approximately 3,358 lbs of VOCs in excess of permitted limits during a 209 hr period.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7) 30 TAC Chapter 101, SubChapter F 101.201(b)(8) 30 TAC Chapter 101, SubChapter F 101.201(c) 30 TAC Chapter 101, SubChapter F 101.211(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to submit a final record no later than 2 weeks after the end of the emissions event or scheduled activity causing the emissions. 3 final record reports were late: (1) for a scheduled emission event which ended on June 13, 2003, submitted late on July 3, 2003; (2) for the emissions event which started on April 21 and ended on April 22, 2004, submitted on May 11, 2004; and (3) for the emissions event that began on April 28 and ended on April 29, 2004, submitted on May 14, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b) Rgmt Prov: 18936/PSD-TX-762M2, General Condition 8 PERMIT

Description: TOTAL has failed to prevent unauthorized emission releases. Beginning on June 13, 2003, during a 3 hr 2 min period, the South Flare, EPN 142, released 5,073.07 lbs of SO2 in excess of the limit of 0.34 lbs/hr.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 9195A/PSD-TX453M6, SC 1 PERMIT

Description: TOTAL has failed to maintain an emission rate below the allowable emission limits. Two emissions events occurred at the Tail Gas Thermal Oxidizer (EPN 125): (1) on July 14, 2004, during a 10.76 hr period, 44,784.01 lbs of SO2 and 469.74 lbs of H2S were emitted in excess of limits; (2) on July 23, 2004, for a 12.27 hr duration, 63,673.00 lbs of SO2 and 672.32 lbs of H2S were emitted above limits.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7)

30 TAC Chapter 101, SubChapter F 101.201(b)(8) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to completely speciate the VOC emissions in the final reports for emissions events that began on September 16 and October 15, 2004, and to specify the presence and quantity of CO released during an April 22, 2005, emissions event in its final report.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(4)

30 TAC Chapter 101, SubChapter F 101.201(b)(7)

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

30 TAC Chapter 101, SubChapter F 101.211(b)(5)

30 TAC Chapter 101, SubChapter F 101.211(b)(8)

30 TAC Chapter 101, SubChapter F 101.211(b)(9)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to include all of the required information in the final reports submitted for the emission event reporting. Specifically, the missing information included failure to identify the Facility Identification Number or the EPN, contain the compound descriptive type, and the estimated total quantities emitted for Incident Numbers: 40432, 41321, 41322, 41324, 41325, 41343, 41344, 41461, 41462, 42608, 42751, 42824, 42922, 42923, 42925, 43572, 45280, 38844, 38845, 38846, 38847, 38848, 39

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

30 TAC Chapter 101, SubChapter F 101.201(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to submit a final report within two weeks if the information differs from the information provided in the initial notification. Specifically a final report was not submitted for Incident No. 40025 within 14 days. Also failed to submit the initial reports within 24 hrs for Incidents 39529 and 39788.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: 18936, PSD-TX-762M2, General Condition 8 PERMIT

49743, Maximum Allowable Emission Rates PERMIT 54026, SPECIAL CONDITION 1 PERMIT 9195A, PSD-TX-453M6 (SC-1) PERMIT

PSD-TX-453M6, MAES - Special Condition 2 PERMIT

Description: TOTAL has emitted into the atmosphere unauthorized air contaminants during 15 emissions

events.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 9195A/PSD-TX-453M6, Special Condition 1 PERMIT

Permit No. 49743, (SC-1) PERMIT Permit No. 54026, (SC-1) PERMIT

Permit No. 9193A, PSD-TX-453M6, (SC-2) PERMIT

Description: TOTAL has emitted into the atmosphere unauthorized air contaminants during 4 emission

events

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 54026 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions above permitted limits during two emissions events. Specifically, beginning on September 16, 2004, EPN 53SOUTHFLR at the Area 1 East End Complex released approx. 254 lbs of H2S and 2,247 lbs of VOC in excess of permitted limits during a 1.08 hr period; beginning on November 14, 2004, EPN 41NORTHFLR at the Area 2 FCCU released approx. 86 lbs of H2S, 1,574 lbs of SO2, and 7964 lbs of VOC in excess of permitted limits during a 20.27 hr period.

Classification: Minor

Citation; 30 TAC Chapter 101, SubChapter F 101.201(a)

30 TAC Chapter 101, SubChapter F 101.201(g) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to electronically submit the final report for the emissions event that began on November 14, 2004, and to notify the TCEQ within 24 hrs of the April 22, 2005, emissions event.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2) 5C THC Chapter 382, SubChapter A 382.085(b) Rgmt Prov: 18936/PSD-TX-762M2, General Condition 8 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions above permitted limits. Beginning on April 22, 2005, EPN 55RGNFLGS at the Area 2 FCCU released approximately 377 lbs of NOx in excess of permitted limits during a 7 hr period.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)

30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(b)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 18936/PSD-TX-762M2, Special Condition 1A PERMIT

18936/PSD-TX-762M2, Special Condition 8 PERMIT

Description: TOTAL has failed to maintain the SO2 and NOx concentrations below the maximum allowable limits. FCCU flue gas vent stack's CEMS documented an average hourly SO2 concentration greater than 50 ppm by volumn from 2015 to 2115 and from 2200 to 2400 hrs and an average hourly NOx concentration greater than 70 ppm from 0815 to 1115 and from 1145 to 1830 on April 22, 2005.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to notify the Beaumont Regional Office within 24 hrs of a reportable emissions event. The event was discovered on October 31, 2004 at 0919 hrs and was reported on November 1, 2004 at 1132 hrs.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(1)

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30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60,104(b)(1)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: 18936/PSD-TX-762M2 PERMIT

18936/PSD-TX-762M2, Special Condition 1A PERMIT

Description: TOTAL has failed to maintain an emission rate below the authorized emission limit.

Unauthorized emissions of 7350.56 lbs of SO2 were released from the Wet Gas scrubber on October 31, 2004. Additionally, the SO2 concentration was not maintained below the maximum allowable limit of 50 ppm during the emissions event.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 49743 PERMIT

Description: TOTAL has failed to prevent unauthorized VOC emissions of 432 lbs on November 8, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 54026, Special Condition 1 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions of 1648.76 lbs of SO2 during a one hr

thirty-six min emissions event which occurred at the South Flare on May 3, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 18936/PSD-TX-762M2 PERMIT

Description: TOTAL has failed to maintain the VOCs emission rate below 7.56 lbs/hr. at the FPM Cooling Tower between May 17, 2005, and December 15, 2005. Cooling tower leaks occurring on May 31, July 20, September 7 - 27, and December 14 - 15, 2005 released 23,267.28, 11,899.72, 11,842 and 18,637.12 lbs of unauthorized VOCs respectively.

Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter P 106.371

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: BY RULE 106.371 PERMIT

Description: TOTAL has failed to maintain the VOCs emission rate below 0.07 lbs/hr at the 805 Reformer

Cooling Tower from March 15, until March 18, 2005 when unauthorized emissions of 560.8 lbs of benzene, 1062.6 lbs of toluene, and 88.8 lbs of xylene (a total of 1,712.2 lbs of VOCs) occurred.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116,115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR Permit No. 54026 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions of 1835.42 lbs of SO2 during a nine hr emissions event which occurred at the Middle Flare (EPN-53 MIDFLARE) on June 19, 2005.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: TOTAL has failed to properly notify the TCEQ Beaumont Regional Office of a reportable emissions event. Specifically, an emissions event began on June 19, 2005 at 11:45 hrs, but was not reported until June 20, 2005 at 15:53 hrs, in excess of the 24 hr reporting requirement.

Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106,6(b)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: Permit by Rule, Registration No. 72930 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions from Tank 532 (EPN 22TANK0532) on August 19, 2005 due to an emissions event. Specifically, unauthorized emissions of 66.42 lbs of 1,2,4-Trimethylbenzene, 5.76 lbs of Ethylbenzene, 43.84 lbs of hexane, 4.21 lbs of isopropyl benzene, 172.92 lbs of toluene, 1620.24 lbs of VOC, and 194.61 lbs of xylene were released.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)

30 TAC Chapter 122, SubChapter B 122.165(b) 5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov: O-02222 OP

Description: TOTAL has failed to report the occurrence of deviations in a SDR, failed to submit an ACC, and failed to properly certify a SDR. Specifically, TOTAL failed to properly certify their SDR for the period of May 14, 2005 to November 13, 2005, failed to report a deviation in the November 14, 2005 to May 14, 2006 SDR, and failed to submit an ACC for the period of May 14, 2005 to May 14, 2006.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 54026 PERMIT

Description: TOTAL has failed to prevent unauthorized emissions of 99.28 lbs of H2S and 9,078.06 lbs of SO2 from Unit 835. The permitted limits for H2S and SO2 are 0.12 lbs/hr and 10.66 lbs/hr, respectively. The event occurred on July 17, 2006, and lasted for 5 hrs and 14 mins.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 18963\PSD-TX-762M3, General Condition 8 PERMIT

O-01267, General Terms and Conditions OP

O-01267, Special Condition 27 OP

Description: TOTAL has failed to maintain VOCs emissions below the allowable emissions rate. Specifically, 592,311 lbs of unauthorized VOC from the FPM Cooling Tower were released from July 12 through November 27, 2006, due to exchanger leaks within the saturated Liquids and Crude Units.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 54026, Special Condition 1 PERMIT

O-1267, General Terms & Conditions OP O-1267, Special Terms & Conditions 27 OP

Description: TOTAL has failed to prevent unauthorized emissions of 7.35 lbs of H2S and 675.88 lbs of SO2 during a 14.57 hr emissions event which occurred at the South Flare during the startup of Unit 804 on December 29, 2006.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 54026, Special Condition 1 PERMIT

9195A and PSD-TX-453M6, SC 1 PERMIT O-01267, General Terms and Conditions OP

O-01267, Special Condition 27 OP

Description: TOTAL has failed to prevent unauthorized emissions of 229.98 lbs of H2S, 22,144.41 lbs of SO2, 352.24 lbs of NOx, 666.45 lbs of Carbon Monoxide CO, 19.42 lbs of PM, 30.76 lbs of VOC, and 10.10 lbs of NH3 from the North and South Flares and the Sulfur Recovery Tail Gas Oxidizer during a 4 hr 40 minute emissions event on November 29, 2006.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 54026, Special Condition 1 PERMIT

O-01267, General Terms and Conditions OP

O-01267, Special Condition 27 OP

Description: TOTAL has failed to prevent unauthorized emissions of 13.51 lbs of H2S and 1264.68 lbs of SO2 from the North and South Flares during a 2 hr 42 min emissions event on December 10, 2006.

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Effective Date: 10/04/2009 ADMINORDER 2009-0491-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.146(2)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: O-02222 OP

Description: Failure to submit an Annual Compliance Certification (ACC) no later than 30 days after the

end of the reporting period. EIC A8 MOD (2)(B) HPV

Effective Date: 10/31/2009 ADMINORDER 2008-0413-AIR-E

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)
Romt Prov: 54026, Special Conditions 1 PERMIT

O-01267, Special Condtion 26 OP

Description: Failure to maintain an emission rate below the allowable emission limit.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Rgmt Prov: O-01267, Special Condition 2(F) OP

Description: Failure to properly report an emission event.

Classification; Major

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: 56409, Special Condition 1 PERMIT

O-01267, Special Condition 27 OP

Description: Failure to maintain an emission rate below tha allowable emission limit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: 20381, Special Condition 1 PERMIT

O-02222, Special Condition 14 OP

Description: Failure to maintain an emission rate below the allowable emission limit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: 9195A, Special Condition 1 PERMIT

O-01267, General Terms and Conditions OP

O-01267, Special Condition 26 OP

Description: Failure to maintain an emission rate below the allowable emission limit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: 1267, General Terms and Conditions OP

1267, Special Terms and Conditions 27 OP

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49136, General Condition 8 PERMIT

Description: Failure to maintain an emission rate below the allowable emission limit. EIC A8(c)(2)(A)(ii)

MOD(2)(D)

Effective Date: 03/20/2010 ADMINORDER 2009-1446-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition 8 PERMIT

Special Condition 26 OP

Description: Failure to maintain allowable emissions rates.

Effective Date: 07/11/2010 ADMINORDER 2009-1921-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Conditions OP

Special Condition 1 PERMIT Special Condition 28 OP

Description: Failure to maintain an emission rate below the allowable emission limit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116,115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Conditions OP

Special Condition 1 PERMIT Special Condition 28 OP

Description: Failure to maintain an emission rate below the allowable emission limit. EIC A8c(2)(A)(ii)

MOD (2)(D)

Effective Date: 08/09/2010 ADMINORDER 2009-2089-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Special Conditon 14 OP

Description; Failure to maintain allowable emissions rates. A8c(2)(A)(ii).

Effective Date: 08/30/2010 ADMINORDER 2010-0257-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: Special Condition 28 OP

Special Condition PERMIT

Description: Failure to maintain an emission rate below the allowable emission limit. EIC A8c2(A)(ii) MOD

(2)(D)

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 2F OP

Description: Failure to properly report emission events. EIC C3 MIN (3)(C)

Effective Date: 08/30/2010 ADMINORDER 2006-0561-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 20381/PSD-TX-1005/N-044 PERMIT

O-02222/Special Condition 14 OP

Description: Failure to maintain the specific heat factors for the Condensate Splitter Heater EPN 40CSPLth-1. Specifically, on June 22, July 11, 22, and 23, August 3, September 20 and 28, and November 8, 2004, the CO heat specific factor of 0.011 pounds per million British Thermal Units ("lbs/MMBtu") per hour was exceeded for a total of 15 hours. Also, on July 10 and 22, 2004, the NOx heat specific factor of 0.08 lbs/MMBtu per hour was exceeded for a total of 22 hours.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)

30 TAC Chapter 122, SubChapter B 122.143(15) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(d)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: FOP O2222 General Terms and Conditions OP

O-01267, General Terms and Conditions OP

O-01267, Special Condition 9A OP

Description: Failure to include a certificate of accuracy and completeness signed by a responsible official in reports submitted to the ED. Specifically, the following reports were not certified by a responsible official: the 05/14/04 to 11/14/04, and 11/15/04 to 05/14/05, deviation reports for FOP No. 2222; the 05/14/04 to 05/14/05, annual compliance certification for FOP No. 2222; the 11/22/04 to 05/22/05, deviation report for FOP No. 1267; and the CEMS Certification Report submitted 10/28/05.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 113, SubChapter C 113.120 30 TAC Chapter 115, SubChapter B 115.114(a)(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20381/PSD-TX-1005/N-044 PERMIT

O-02222/Special Condition 14 OP

Description: Failure to conduct annual seal gap measurements on external floating roof tanks.

Specifically, TOTAL failed to conduct the annual seal gap measurements on Tanks 800, 801, and 802 for the period covering May 14, 2004 to May 14, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20381/PSD-TX-1005/N044 PERMIT

O-02222, Special Condition 14 OP

Description: Failure to comply with the PM and VOC emission rates. Specifically, on February 17 and March 18, 2005, the Plant experienced heater duty exceedances during which the PM and VOC emission

rates limits of 2.32 and 0.57 lb/hr, respectively, were exceeded for the condensate splitter heater EPN 40CSPLth-1.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)

30 TAC Chapter 122, SubChapter B 122,146(5)(C)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to list a rule citation in the November 14, 2004 to May 14, 2005, semiannual deviation report for FOP No. 2222. Specifically, TOTAL failed to list 30 Tex. Admin. Code § 115.114(a)(2) as part of the requirements to physically measure Tanks 800, 801, 802, and 805 for seal gaps on an annual basis. Also, for the November 22, 2004 through May 22, 2005, reporting period TOTAL failed to report deviations for FOP 1267.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: 18936/PSD-TX-762M2 PERMIT

Description: Failure to maintain the VOC emission rate at the FPM Cooling Tower. Specifically, due to leakage during a 44 hr, 6 minute period from January 12-14, 2005, the tower released 2,125.93 lbs of VOCs, which is 1,792.5 lbs above permitted limits.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: 56382, Special Condition 19B PERMIT

56385, Special Condition 3 PERMIT O-01267, Special Condition 27 OP

Description: Failure to conduct and record daily calculations of Mixed Liquid Suspended Solids, food-to-microorganism ratios, and residence time. Specifically, records were not created and maintained for Aeration Tanks 403A, 403B, and 403C from November 22, 2004 through May 22, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 5694A, Special Condition 3 PERMIT

O-01267, Special Condition 27 OP

Description: Failure to comply with the fired duty rate at four emission units.

Classification: Moderate

tation: 30 TAC Chapter 101, SubChapter A 101,20(1)

30 TAC Chapter 115, SubChapter B 115.114(a)(2) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: O-01267, Special Condition 1A OP

Description: Failure to conduct annual seal gap measurements on external floating roof tanks. Specifically, TOTAL failed to conduct annual seal gap measurements on Tanks 22TANK0503,

67TANK0504, 67TANK0505, 20TANK2001, AND 20TANK2002.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.114(a)(4)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: O-01267, Special Condition 1A OP

Description: Failure to conduct semiannual visual tank seal inspections. Specifically, TOTAL failed to conduct visual inspections between November 22, 2004 and May 22, 2005, on 28 floating roof tanks.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)

30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 16840/PSD-TX-688M2, Special Condition 2 PERMIT

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16840/PSD-TX-688M2, Special Condition 4B PERMIT

18936/PSD-TX-762M2, Special Condition 7 PERMIT

18936/PSD-TX-762M2, Special Condition 8 PERMIT

2347, Special Condition 5 PERMIT

3615/PSD-TX-058, Special Condition 2 PERMIT

43109, Special Condition 3A PERMIT

43109, Special Condition 3B PERMIT

43109, Special Condition 5 PERMIT

55684, Special Condition 7 PERMIT

9194A/PSD-TX-453M6, Special Condition 3 PERMIT

9195A/PSD-TX-436M6 PERMIT O-01267, Special Condition 27 OP

Description: Failure to maintain emission limits in seven emissions areas.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: O-01267, Special Condition 1D OP

Description: Failure to submit a FOP revision application no later than April 11, 2005, to codify 40 C.F.R.

ch. 63, subpart UUU, into the permit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: 54026, Special Condition 5D PERMIT

54026, Special Condition 6 PERMIT

O-01267, Special Condition 27 OP

Description: Failure to install and operate a continuous flow monitor/analyzer within 18 months (April 8, 2005) of permit issuance on October 2, 2003. Specifically, analyzers had not been installed on the North, Middle, or South flares.

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 9195A/PSD-TX-453M6, Special Condition 6 PERMIT

O-01267, Special Condition 27 OP

Description: Failure to maintain the minimum sulfur recovery efficiency of the Sulfur Recovery Unit ("SRU"). Specifically, from June 30 until July 5, 2005, the sulfur recovery efficiency at the SRU (SRU 1 and 3) was less than 99.9%.

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: O-01267, Special Condition 15(a) OP

Description: Failure to conduct annual monitoring of benzene containers. Specifically, TOTAL failed to conduct annual monitoring on vacuum trucks managing benzene waste at the Plant for the period between November 22, 2004 and November 21, 2005.

Classification: Moderate

Citation: 30

30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(b)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: O-01267, Special Condition 15(a) OP

Description: Failure to conduct quarterly visual inspections of benzene containers. Specifically, TOTAL failed to conduct quarterly visual inspections on vacuum trucks managing benzene waste at the Plant during the first three quarters of the period between November 22, 2004 and November 21, 2005.

Classification: Moderate

Citation

30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: 56385, Special Condition 12L PERMIT

O-01267, Special Condition 27 OP

Description: Failure to conduct quarterly visual inspections of unburied sewer lines. Specifically, TOTAL did not conduct quarterly visual inspections on unburied VOC-bearing sewer lines on the Wastewater Collection and Treatment System between November 22, 2004 and November 21, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 56385, Special Condition 9A PERMIT

O-01267, Special Condition 27 OP

Description: Failure to conduct daily VOC breakthrough monitoring. Specifically, the Carbon Absorption System (CAS) at the Plant was not monitored on weekends from November 22, 2004 through November 21, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(ii)(B)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: O-01267, Special Condition 15(a) OP

Description: Failure to install a car-seal on the CAS. Specifically, from May 22 to November 21, 2005, the CAS did not have a car-seal or other closure to serve as a flow indicator of bypass conditions.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(1)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: O-01267, Special Condition 1A OP

Description: Failure to conduct monthly valve monitoring. Specifically, TOTAL is limited to seven (less than 3%) difficult-to-monitor valves; however, eight valves (3.2%), listed as difficult-to-monitor, out of 243 valves at the 829 Amine Unit, were not monitored on a monthly basis during the first quarter of the November 22, 2004 to November 21, 2005 period.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101,20(1)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(c)(6) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(c)(2)(vii)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: O-01267, Special Condition 1A OP

Description: Failure to explain and authorize the delay of repair of VOC component leaks in a semiannual report. Specifically, the delay of repair explanation and authorization signature were not submitted for five components at 812-ACU1 in the deviation report for FOP 1267 covering May 22 to November 21, 2005

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101,20(1)

30 TAC Chapter 122, SubChapter B 122,143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(5)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: O-01267, Special Condition 1A OP

Description: Failure to notify the agency 30 days prior to a seal gap test. Specifically, TOTAL failed to notify the TCEQ of TOTAL's intent to conduct a seal gap test on Tanks 22TANK0505, 22TANK0482, and 22TANK0530.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: O-01267, Special Condition 24 OP

Description: Failure to maintain the proper temperature at the Reformer Unit. Specifically, from September 5 to September 7, 2005, the Reformer Unit did not maintain the proper required temperature established by testing.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: O-01267, Special Condition 24 OP

Description: Failure to use an EPA-approved method to identify chlorides. Specifically, on 99 occasions from May 22 until November 21, 2005, TOTAL did not use an EPA-approved method to identify chlorides

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on the Catalytic Cracking Regenerator ("CCR") catalyst.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

> 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: 46396, Special Condition 4 PERMIT

O-01267, Special Condition 27 OP

Description: Failure to maintain the proper temperature at the Dock Flare 2 Stack. Specifically, on 50 occasions from May 22 to November 21, 2005, the firebox exit temperature was less than 1580 degrees

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

> 30 TAC Chapter 122, SubChapter B 122,143(4) 5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: 17920, Special Condition 9A PERMIT

O-01267, Special Condition 27 OP

Description: Failure to conduct audio, visual, and olfactory (AVO) checks at least once per shift. Specifically, AVO checks for VOC, ammonia, and hydrogen sulfide at the Sour Water Stripper Facility were not conducted from May 22, to July 21, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 2347, Special Condition 8A PERMIT

O-01267, Special Condition 27 OP

Description: Failure to conduct AVO checks for leaks every four hours. Specifically, AVO checks at the DHT-1 and DHT-2 Units were not conducted from May 22 until July 27, 2005.

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THC Chapter 382, SubChapter D 382,085(b)

Rgmt Prov: 9195A/PSD-TX-453M6, SC 5 PERMIT

O-01267, SC 27 OP

Description: Failure to maintain reactor flame temperature. Specifically, from December 6, 2004 to January 31, 2005, February 13 through 23, 2005, March 18 to April 29, 2005, and May 6 through 23,

2005, the reactor flame temperature of 2200 degrees F (amended on July 7, 2005, to 2114 degrees F) was not maintained at SRU 3.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113,120

> 30 TAC Chapter 115, SubChapter B 115.114(a)(1) 30 TAC Chapter 122, SubChapter B 122,143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(a)(2)(i)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: O-01267, Special Condition 1A OP

Description: Failure to conduct visual inspections on internal floating roof tank seals. Specifically,

TOTAL failed to conduct annual visual inspections on the roof seals for tanks 22TANK0926.

50TANK0928, 50TANK0929, and 50TANK0930 for the period ending May 22, 2005.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120

> 30 TAC Chapter 115, SubChapter B 115,114(a)(2) 30 TAC Chapter 122, SubChapter B 122,143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(1)(iii)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: O-01267, Special Condition 1A OP

Description: Failure to conduct annual seal gap measurements on external floating roofs. Specifically, TOTAL failed to conduct annual seal gap measurements on 23 tanks for the period ending May 22, 2005.

Classification: Moderate

30 TAC Chapter 115, SubChapter B 115.114(a)(3) Citation:

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: O-01267, Special Condition 1A OP

Description: Failure to conduct seal gap inspections on external floating roof storage tanks. Specifically,

TOTAL failed to conduct annual seal gap inspections for the period ending May 22, 2005, for tank 22TANK0938.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(d)(5)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to submit correct semi-annual reports. Specifically, TOTAL failed to specify in two semi-annual reports from November 22, 2004 to November 21, 2005, whether actions taken during shutdowns, startups, and maintenance (SSM) were performed according to SSM plans.

B. Any criminal convictions of the state of Texas and the federal government.

(440744)

N/A

C. Chronic excessive emissions events.

1 09/19/2005

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

	00/10/2000	(440/44)
2	10/21/2005	(468272)
3	11/04/2005	(431104)
4	11/04/2005	(435646)
5	11/04/2005	(436336)
6	11/15/2005	(405196)
7	11/15/2005	(434630)
8	11/15/2005	(435255)
9	11/15/2005	(436155)
10	11/15/2005	(436413)
11	11/18/2005	(435774)
12	11/18/2005	(435798)
13	11/18/2005	(435804)
14	11/18/2005	(435866)
15	11/21/2005	(468273)
16	12/07/2005	(435751)
17	12/12/2005	(404612)
18	12/15/2005	(468274)
19	01/18/2006	(449944)
20	01/19/2006	(439503)
21	01/19/2006	(440180)
22	01/23/2006	(468275)
23	01/24/2006	(452104)
24	02/06/2006	(437341)
25	02/07/2006	(450128)
26	02/07/2006	(453479)
27	02/13/2006	(450178)
28	02/13/2006	(450341)
29	02/15/2006	(454193)
30	02/21/2006	(468270)
31	02/24/2006	(450992)
32	02/24/2006	(452413)
33	03/21/2006	(468271)
34	04/10/2006	(454251)
35	04/18/2006	(455136)
36	04/21/2006	(498089)
37	04/28/2006	(462859)
38	05/11/2006	(461924)
39	05/11/2006	(463343)
40	05/11/2006	(464168)
41	05/11/2006	(464460)
42	05/11/2006	(464467)

43 05/11/2006

(464473)

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44	05/11/2006	(465489)
45	05/11/2006	(465492)
46	05/11/2006	(465518)
47	05/11/2006	(465525)
48	05/12/2006	(451451)
49	05/12/2006	(454148)
50	05/12/2006	(454494)
51	05/12/2006	(463148)
52	05/22/2006	(464542)
53	05/22/2006	(498090)
54	05/30/2006	(461199)
55	06/14/2006	(480809)
56	06/22/2006	(498091)
57	06/28/2006	(465850)
58	07/21/2006	(520109)
59	07/25/2006	(482058)
60	07/27/2006	(485194)
		, ,
61	08/23/2006	(520110)
62	08/31/2006	(460545)
63	09/19/2006	(520111)
64	09/22/2006	(510639)
65	10/20/2006	(544367)
66	11/15/2006	(517804)
		•
67	11/22/2006	(544368)
68	12/21/2006	(544369)
69	12/28/2006	(335708)
70	12/29/2006	(431565)
71	01/12/2007	(531450)
72	01/18/2007	(532164)
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73	01/23/2007	(544370)
74	01/29/2007	(531801)
75	02/01/2007	(537518)
76	02/01/2007	(538715)
77	02/02/2007	(497612)
78	02/05/2007	(466788)
		,
79	02/14/2007	(539270)
80	02/14/2007	(540328)
81	02/21/2007	(575101)
82	02/23/2007	(540617)
83	03/19/2007	(538927)
84		(575102)
		(542889)
85		, ,
86		(540306)
87	04/26/2007	(575103)
88	05/17/2007	(554816)
89	05/18/2007	(554787)
90	05/18/2007	(575104)
91		(558572)
92		(575105)
93		(558540)
94		(565190)
95	07/11/2007	(542342)
96	07/11/2007	(560069)
97	07/20/2007	(575106)
98		(567241)
99		(567736)
100		(543994)
101	08/20/2007	(601546)

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102	08/30/2007	(564577)				
	09/17/2007	(601547)				
	09/26/2007	(573894)				
	10/23/2007	(619450)				
	10/23/2007	(619453)				
107	10/26/2007	(596024)				
108	11/08/2007	(594034)				
109	11/16/2007	(595084)				
110	11/20/2007	(619451)				
111	11/27/2007	(594170)				
112	11/27/2007	(598818)				
113	12/10/2007	(610704)				
114	12/21/2007	(594470)				
115	12/21/2007	(619452)				
	01/16/2008	(612034)				
	01/31/2008	(613691)				
	02/01/2008	(614929)				
	02/06/2008	(6 <b>1</b> 5511)				
	02/14/2008	(679796)				
	02/18/2008	(671960)				
	03/03/2008	(613917)		•		
	03/03/2008	(616707)				
	03/03/2008					
	03/03/2008	(616879)				
		(616883)				
	03/03/2008	(617277)				
	03/10/2008	(614708)				
	03/14/2008	(637140)				
	03/18/2008	(671961)			-	
	04/03/2008	(618981)				
	04/03/2008	(619010)				
	04/07/2008	(638446)				
	04/07/2008	(640577)				
	04/09/2008	(636187)				
135	04/09/2008	(637830)				
136	04/17/2008	(671962)				
137	04/24/2008	(641834)				
138	05/08/2008	(646149)				
139		(654397)				
140	05/13/2008	(689880)				
141	05/14/2008	(646173)				
142	05/14/2008	(646249)				
	05/14/2008	(646292)				
	05/23/2008	(640976)				
	05/28/2008	(679929)				
	06/03/2008	(641229)				
147		(680279)				
	06/13/2008	(653949)				
	06/16/2008	(689881)				
	06/18/2008	(654558)	•			
151		(433051)				
	07/08/2008					
		(683932) (683891)				
	07/09/2008	(683891)				
	07/09/2008	(689882)				
	07/18/2008	(680236)				
	07/20/2008	(686130)				
157		(686798)				
	08/01/2008 08/02/2008	(683847)				
	ロメルフアスのの名	(686525)				

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160	08/08/2008	(600040)
160		(689242)
161	08/11/2008	(710654)
162	08/19/2008	(689537)
163	09/26/2008	(710655)
164	10/13/2008	(710656)
165	11/03/2008	(710657)
166	11/25/2008	(704294)
167	11/25/2008	(707822)
		, ,
168	11/25/2008	(708173)
169	12/08/2008	(709730)
170	12/08/2008	(709732)
171	12/11/2008	(727425)
172	12/15/2008	(721187)
173	12/30/2008	(707925)
174	01/14/2009	(727426)
175	01/15/2009	(709746)
176	01/22/2009	(683914)
		•
177	01/23/2009	(723990)
178	02/11/2009	(750182)
179	02/19/2009	(724010)
180	02/20/2009	(724769)
181	02/20/2009	(724871)
182	02/25/2009	(722192)
183	03/15/2009	(750183)
184	03/25/2009	(738580)
185	04/02/2009	(741283)
186	04/03/2009	(735828)
187	04/08/2009	` '
		(738716)
188	04/08/2009	(750184)
189	04/14/2009	(741430)
190	04/23/2009	(743539)
191	05/15/2009	(768293)
192	06/03/2009	(743882)
193	06/10/2009	(768294)
194	06/10/2009	(768295)
195	06/17/2009	(745434)
196	06/19/2009	(748246)
100	00/13/2003	(140240)
197	07/03/2009	(746147)
198	07/28/2009	(747611)
199	07/28/2009	(761630)
200	07/29/2009	
		(762923)
201	07/29/2009	(762945)
202	08/17/2009	(804455)
203	08/26/2009	(761200)
204	08/27/2009	(767640)
205	08/31/2009	(763762)
206	08/31/2009	(764693)
207	08/31/2009	(765166)
208	09/09/2009	(804456)
209	09/23/2009	(766537)
210	10/05/2009	(766803)
211	10/05/2009	
		(776143)
212	10/05/2009	(776463)
213	10/06/2009	(778427)
214	10/13/2009	(761853)
215	10/13/2009	(766561)
216	10/16/2009	(804457)
217	10/19/2009	(767318)

218	10/23/2009	(764009)
219	11/03/2009	(780844)
220	11/05/2009	(778036)
221	11/10/2009	(781160)
222	11/10/2009	(781162)
		•
223	11/10/2009	(781165)
224	11/18/2009	(804458)
225	11/20/2009	(766235)
226	11/20/2009	(778703)
227	11/24/2009	(782730)
228	12/01/2009	(781499)
229	12/09/2009	
		(784593)
230	12/14/2009	(804459)
231	12/22/2009	(785159)
232	12/23/2009	(780115)
233	12/23/2009	(782403)
234	12/23/2009	(784332)
235	12/29/2009	(784896)
236	12/29/2009	(785759)
237	01/15/2010	(804460)
238	02/08/2010	` '
		(788346)
239	02/09/2010	(781878)
240	02/09/2010	(787401)
241	02/09/2010	(787561)
242	02/09/2010	(787940)
243	02/12/2010	(804454)
244	02/15/2010	(786380)
245	02/15/2010	(790914)
246	02/17/2010	(791215)
247	02/17/2010	(791423)
248	03/10/2010	(830807)
249	03/18/2010	(792686)
250	03/21/2010	(793295)
251	03/23/2010	(793733)
252	03/26/2010	(795014)
253	03/30/2010	(795174)
254	04/12/2010	(797840)
255	04/13/2010	(797733)
		, ,
0.55	0.444.010.04.0	(700070)
256	04/16/2010	(798879)
257	04/19/2010	(830808)
258	04/26/2010	(795684)
259	05/06/2010	(796813)
260	05/06/2010	(797393)
261	05/10/2010	(796073)
262	05/13/2010	(785195)
263	05/13/2010	(830809)
264	05/28/2010	(824387)
265		,
	06/02/2010	(803580)
266	06/10/2010	(825551)
267	06/10/2010	(846243)
268	06/17/2010	(803554)
269	07/13/2010	(860839)
270	07/26/2010	(789923)
271	08/06/2010	(829624)
272	08/13/2010	(830163)
273	08/13/2010	(830311)
274	09/16/2010	(864088)
275	09/16/2010	(864360)
213	50/10/2010	(004000)

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11/30/2005 Date: (468274)

Self Report? YES Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter Description:

Date: 01/31/2006 (468270)CN600582399

Self Report? YES Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26,121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 04/10/2006 CN600582399 (454251)

Self Report? Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(4) Citation:

PC, 2g PERMIT

Description: Failure by the permittee to contain contact storm water resulting in an

unauthorized discharge.

Self Report? Classification: Minor

Citation: OpR. No. 1 PERMIT

Description: Failure by the permittee to properly operate and maintain all systems of collection,

treatment, and disposal.

Self Report? NO Classification:

Citation: Opr, No. 1 PERMIT

Description: Failure by the permittee to properly operate and maintain all systems of collection,

treatment, and disposal.

CN600582399 Date: 05/31/2006 (461199)

Self Report? Classification: Moderate

30 TAC Chapter 335, SubChapter A 335.6(c) Citation:

Description: The facility failed to update the notice of registration

Self Report? NO Classification: Moderate

30 TAC Chapter 335, SubChapter C 335.69(a)(4)(A) Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(4)

Description: Failure to list job titles and job descriptions for each employee handling

Self Report?

Classification: Moderate

40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(2) Citation:

Containers of waste at the PWTC lab and NOR unit nos. 005, 029 and 030 did not Description:

list the date of initial accumulation.

Date: 06/30/2006 (520109)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 12/31/2006 (544370)

Self Report? Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 03/31/2007 (575103)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305,125(1)

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 08/30/2007 (571169)

NO

Self Report? NO Citation:

18936 and PSD-TX-762M2, SC 7 PERMIT 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description: Failure to maintain the 70 parts per million by volume (ppmv) limit for Nitrogen

oxides (NOx) on the Fluid Catalytic Cracking Unit (FCCU) Regenerator Stack.

Classification: Moderate

Classification: Moderate

Classification: Moderate

Classification:

Classification: Moderate

Moderate

MOD (2)(D) EIC B18

Self Report?

18936 and PSD-TX-762M2, SC 1A PERMIT

Citation:

18936 and PSD-TX-762M2, SC 8 PERMIT 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(b)(1)

5C THC Chapter 382, SubChapter D 382.085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description: Failure to maintain the 50 ppmv limit for Sulfur dioxide (SO2) on FCCU

Regenerator Stack. MOD (2)(D) EIC B18

Self Report? NO

Citation: 18936 and PSD-TX-762M2, SC 8 PERMIT

30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description: Failure to maintain the venturi pressure at its minimum rate. MOD (2)(G) EIC B19g.

Self Report? NO

30 TAC Chapter 116, SubChapter B 116,115(c) Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

46396, SC 4 PERMIT

5C THC Chapter 382, SubChapter D 382.085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Failure to maintain the minimum temperatures required while loading products at Description:

the dock flares. MOD (2)(G) EIC B19g.(1)

Self Report? NO

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

43109, SC 3A and B PERMIT

5C THC Chapter 382, SubChapter D 382.085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description:

Failure to maintain the permitted NOx and CO limits for Package Boilers H-300 and

H-350. MOD (2)(D) EIC B18

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122,143(4)

56385, SC 3 PERMIT

5C THC Chapter 382, SubChapter D 382.085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Failure to monitor and record daily the food-to-microorganisms (F/M) ratio, the Description:

mixed liquid suspended solids (MLSS) ratio, and a residence time. MOD (2)(A)

EIC B1

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Self Report? NO

Citation:

17352, SC 4C PERMIT

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description:

Failure to replace immediately with fresh carbon when carbon breakthrough was

indicated by monitoring on canisters. MOD (2)(G) EIC B14

Self Report? Citation: NO

Classification: Moderate

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(b)

5C THC Chapter 382, SubChapter D 382.085(b)

O-01267 SC 15A OP

O-01267, General Terms and Conditions OP

O-01267, SC 1A OP

Description:

Failure to conduct annual no-detectable emissions monitoring and quarterly visual

inspections for containers managing benzene wastes. MOD (2)A) EIC B1

Self Report?

Citation:

? NO

Classifica 30 TAC Chapter 116, SubChapter B 116.115(c)

Classification: Moderate

30 TAC Chapter 122, SubChapter B 122.143(4) 56385, SC 12L PERMIT

5C THC Chapter 382, SubChapter D 382,085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description:

Failure to conduct quarterly visual inspections on unburied sewer lines. MOD (2)

(A) EIC B1

Self Report? Citation:

NO

Classification: Minor

30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.340 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a)

5C THC Chapter 382, SubChapter D 382.085(b) O-01267, General Terms and Conditions OP

O-01267, SC 1A OP O-01267, SC 27 OP

Description:

Failure to operate without a cap, blind flange, plug, or a second valve installed on

equipment in VOC service. MIN (3)(D) EIC C10

Self Report?

Citation:

NO 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122,143(4)

54026, SC 5D PERMIT

5C THC Chapter 382, SubChapter D 382.085(b)

O-01267, SC 27 OP

Description:

Failed to install analyzers which provide a record of the vent stream flow and composition on three flares, North, South, and Middle Flares, Unit Identification Nos. 41NORTHFLR, 53SOUTHFLR, and 41MIDFLARE. Specifically, the Respondent failed to install the analyzers within eighteen months of the permit issuance date of October 8, 2003. The analyzers should have been installed by

April 10, 2005. MOD (2)(A) EIC B1

Self Report? NO

Citation:

Classification: Minor

Classification: Moderate

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

O-01267, General Terms and Conditions OP

O-01267, SC 1D OP

Description:

Failure to submit a revision application to codify the requirements in the permit of

40 CFR Part 63, Subpart UUU and 30 TAC 113,780 by April 11, 2005, in FOP

O-01267. Min (3)(C), EIC C3

Self Report? NO

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4)

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5694A, GC 8 PERMIT

5C THC Chapter 382, SubChapter D 382,085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description:

Failure to maintain an allowable emissions rate. MOD (2)(D) EIC B14

Classification: Moderate

Self Report? NO

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 122, SubChapter B 122.143(4)

5694A, GC 8 PERMIT

5C THC Chapter 382, SubChapter D 382,085(b) O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description:

Failure to maintain an allowable emissions rate. MOD (2)(D) EIC B14

Self Report?

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

8983A, SC 1 PERMIT

O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description: Self Report? Failure to maintain an allowable emissions rate. MOD (2)(D) EIC B14

Classification: Moderate 30 TAC Chapter 116, SubChapter B 116,115(c)

Citation:

30 TAC Chapter 122, SubChapter B 122,143(4)

56385, SC 3 PERMIT

5C THC Chapter 382, SubChapter D 382,085(b)

O-01267, SC 27 OP

Description:

Failed to maintain the food-to-microorganisms (F/M) ratio on the Enhanced Biodegradation Unit Aeration Tanks A, B, and C. Specifically, the Respondent failed to maintain the F/M ratio in the range of 0.05 to 1.0 kilograms of Biochemical Oxygen Demand per kilogram of biomass per day from September 1, 2006

through November 21, 2006. MOD (2)(G) EIC B19g.(1)

Self Report? Citation:

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101,20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382,085(b) 9195A and PSD-TX-453M6, SC 5 PERMIT O-01267, General Terms and Conditions OP

O-01267, SC 27 OP

Description:

Failure to maintain minimum flame temperatures for four consecutive calendar

Classification:

Classification: Moderate

Moderate

quarters. MOD (2)(G) EIC B19q.(1)

Self Report? NO Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(C) 5C THC Chapter 382, SubChapter D 382,085(b) O-01267, General Terms and Conditions OP

Description:

Failure to submit a SDR no later than 30 days after the end of the November 21,

2005 - May 22, 2006 reporting period. MOD (2)(B) EIC B3

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 30 TAC Chapter 122, SubChapter B 122.146(1) 30 TAC Chapter 122, SubChapter B 122.146(5)(D) 5C THC Chapter 382, SubChapter D 382,085(b) O-01267, General Terms and Conditions OP

Description:

Failure to report the occurrence of deviations in semi-annual deviation reports and accurately certify an annual compliance certification. MOD (2)(B) EIC B3

Self Report?

NO 30 TAC Chapter 122, SubChapter B 122.143(4)

Citation:

30 TAC Chapter 122, SubChapter B 122.145(2)(A) 30 TAC Chapter 122, SubChapter B 122.146(1) 30 TAC Chapter 122, SubChapter B 122.146(5)(D)

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5C THC Chapter 382, SubChapter D 382.085(b) O-01267, General Terms and Conditions OP

Description:

Failure to report the occurrence of deviations in semi-annual deviation reports and accurately certify an annual compliance certification. MOD (2)(B), EIC B3

Self Report?

NO

Citation:

18936 and PSD-TX-762M2, GC 8 PERMIT

30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

O-01267, SC 27 OP

Description:

Failed to maintain allowable emissions rates. Specifically, the Respondent exceeded its tons per year limit. The permit limits Tank 589 to 0.31 tons per year ("tpy") of VOC and the Respondent reported emissions of VOCs for Tank 589 to

be 0.3312 tpy during 2005. MOD (2)(D) EIC B18

Date: 11/27/2007

(608889)

CN600582399

Classification: Moderate

Classification: Minor

Classification:

Self Report? NO Citation:

20381, PSD-TX-1005, N-004, SC 7E PERMIT 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 113, SubChapter C 113.340 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122 143(4)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b) O-02222, General Terms and Conditions OP

O-02222, Special Condition 14 OP O-02222, Special Condition 1A OP

Description:

Failure to seal several open-ended lines with a cap, plug, or blind flange.

MIN(3))C), EIC C10

Self Report? Citation: NO Classification: Moderate 20381, PSD-TX-1005, N-044, SC 12 PERMIT

30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b) O-02222, General Terms and Conditions OP

O-02222, Special Condition 14 OP

Description:

Failure to maintain emission rates below the allowable emission limits. MOD (2)

(D), EIC B18

NO

Self Report? Citation:

20381, PSD-TX-1005, N-044, SC 21 PERMIT

30 TAC Chapter 101, SubChapter A 101.20(1)

30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.107(e)

O-02222, General Terms and Conditions OP

O-02222, Special Condition 14 OP O-02222, Special Condition 1A OP

Description:

Failure to submit a report within the required timeframes. MOD (3)C), EIC C3

Date: 02/14/2008

(679796)

Self Report? NO

Classification:

Moderate

Minor

Citation:

30 TAC Chapter 305, SubChapter F 305,125(1)

30 TAC Chapter 305, SubChapter F 305.125(17)

Description:

NON-RPT VIOS FOR MONIT PER OR PIPE

Date: 03/05/2008

(614708)

CN600582399

Self Report? NO

MO Charter 26 Cyclobantar A 20 404(a)(4

Classification: Moderate

Citation:

2D TWC Chapter 26, SubChapter A 26.121(a)(1)

Description:

Failure to prevent the release of 35 barrels of FAS150 Petroleum Distillate on

January 15, 2008 from Storage Tank 317.

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Date: 03/14/2008

(614391)

CN600582399

Self Report? NO Citation:

18936 and PSD-TX-762M3 PERMIT

30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382,085(b) O-01267, Special Condition 27 OP

Description:

Failure to submit a stack test report within the required timeframe (60 days after

sampling was completed). C3 Minor

Date: 03/31/2008

(671962)

CN600582399

Self Report? YES

Classification:

Classification:

Moderate

Minor

Minor

Citation:

2D TWC Chapter 26, SubChapter A 26.121(a)

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 05/28/2008

Citation:

(679929)

CN600582399

Seif Report? NO

30 TAC Chapter 305, SubChapter F 305,125(5)

OpR 1 PERMIT

Description:

Failure by Total Petrochemical to properly maintain units of conveyance by failing to prevent heavy siltation and debris/trash accumulation in Stormwater Control

Structure A.

Self Report?

NO

Classification:

Classification:

Classification: Moderate-

Classification:

Moderate

Moderate

Citation:

30 TAC Chapter 305, SubChapter F 305.125(5)

OpR 1 PERMIT

Description:

Failure by Total Petrochemicals to properly maintain Stormwater Control Structure

E, by failing to maintain the underflow weir and unit sidewalls. Classification:

Self Report? Citation:

2D TWC Chapter 26, SubChapter A 26.121(c)

PC 2g PERMIT

Description: Failure by Total Petrochemicals to prevent unauthorized discharge from the

facility,

Self Report?

NO

30 TAC Chapter 305, SubChapter F 305.125(1)

EL&MR 1, p2c PERMIT

Description:

Citation:

Failure by Total Petrochemicals to comply with permitted effluent limitations for Total Organic Carbon samples collected from Outfall 004 on 03/09/2008, and

03/10/2008.

Date: 05/31/2008

(689881)

CN600582399

Self Report? YES

2D TWC Chapter 26, SubChapter A 26.121(a)

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Citation:

Failure to meet the limit for one or more permit parameter

Date: 06/06/2008

(641229)

CN600582399

Self Report? NO Citation:

2347, Special Condition 10E PERMIT

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) O-01267, Special Condition 27 OP

Description:

Failure to submit stack test report within applicable deadline (60 days after

sampling was completed).

Date: 08/19/2008

(689537)

Self Report?

Classification:

Classification:

Moderate

Minor

30 TAC Chapter 122, SubChapter B 122.143(4)

Citation:

30 TAC Chapter 122, SubChapter B 122,145(2)(C)

5C THSC Chapter 382 382.085(b) General Terms and Conditions OP • .

Description:

Failure to submit a Semiannual Deviation Report (SDR) no later than 30 days after

the end of the reporting period.

Date: 09/30/2008

(710656)

CN600582399

Self Report? YES

2D TWC Chapter 26, SubChapter A 26,121(a)

30 TAC Chapter 305, SubChapter F 305,125(1)

Description:

Citation:

Failure to meet the limit for one or more permit parameter

Date: 11/30/2008

(727425)

CN600582399

Self Report? YES Citation:

Classification: Moderate

2D TWC Chapter 26, SubChapter A 26,121(a)

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 01/22/2009

Citation:

(683914)

CN600582399

Self Report? NO

Classification: Moderate

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Condition 27 OP Special Condition 8 PERMIT

Description:

Citation:

Failure to maintain allowable emissions rates and concentrations.

Self Report?

NO

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382,085(b) Special Condition 1 PERMIT Special Condition 27 OP

Description:

Citation:

Failure to maintain allowable emissions rates.

Self Report?

NO

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT Special Condition 27 OP

Special Condition 3 PERMIT

Description:

Failure to maintain allowable emissions rates and concentrations.

Self Report? NO

Classification: Moderate

Classification;

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116,115(b) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382,085(b) General Condition 8 PERMIT Special Condition 27 OP

Description:

Failure to maintain allowable emissions rates.

Self Report? NO Citation:

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101.20(1)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(e)(4)(i)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Condition 27 OP Special Condition 3 PERMIT

Description:

Failure to maintain allowable emissions rates and concentrations.

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Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT Special Condition 27 OP

Description: Failure to maintain allowable emissions rates.

Self Report? NO

Classification: Moderate

Classification: Moderate

Classification:

Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382,085(b)

Special Condition 27 OP

Special Condition 6 PERMIT

Description: Failure to maintain allowable firing rates.

Self Report? NO

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

Special Condition 2 PERMIT Special Condition 27 OP

Description: Failure to maintain allowable emissions rates and concentrations.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Condition 27 OP

Description: Failure to maintain allowable emissions rates.

Self Report? NO

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 27 OP Special Condition 5 PERMIT

Description: Failure to maintain minimum flame temperature of 2200 degrees Fahrenheit.

Self Report? NO Classification: Moderate

Citation:

O Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 27 OP Special Condition 9 PERMIT

Description: Failure to maintain operation parameters of scrubber circulation rate, liquid to gas

ratio, and venture pressure drop as established in the last satisfactory stack

test.

Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT

Special Condition 27 OP

Description: Failure to maintain allowable emissions rates.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 27 OP Special Condition 4 PERMIT Special Condition 9 PERMIT

Description: Failure to maintain a vacuum greater than 1.5 inches of water on the marine

vapor control system during loading operations.

Self Report? NO Classification: Moderate

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Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382,085(b)

Special Condition 27 OP Special Condition 5.B PERMIT

Description:

Failure to conduct proper maintenance on Tank -926 flare and Benzene tanks

Self Report? NO Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT

Special Condition 27 OP

Description:

Failure to maintain allowable emissions rates.

Self Report? Citation:

Classification: Moderate

Classification: Moderate

Moderate

Moderate

Classification:

Classification:

30 TAC Chapter 101, SubChapter A 101,20(1) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)

5C THSC Chapter 382 382.085(b)

Special Condition 27 OP

Description:

Failure to maintain the content of H2S below 0.1 grains per dry standard cubic

foot (ar/dscf).

Self Report? NO

Citation:

30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382.085(b) Special Condition 23 PERMIT Special Condition 27 OP

Description: Failure to maintain allowable amine circulation rates.

Self Report?

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Permit By Rule (PBR) project 51314 PERMIT

Special Condition 27 OP Special Condition 4 PERMIT

Description:

Failure to maintain allowable firing rates.

Citation:

Self Report? NO

30 TAC Chapter 113, SubChapter C 113,780

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122,143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1567(a)(2)

5C THSC Chapter 382 382.085(b) Special Condition 27 OP Special Condition 3 PERMIT

Description:

Failure to maintain proper temperature at the chlorosorb inlet. Classification: Moderate

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 19 PERMIT Special Condition 27 OP

Description:

Failure to sample Ammonia from acid gas exiting the waste heat boiler.

Self Report?

NO

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 18 PERMIT Special Condition 27 OP

Description:

Failed to maintain allowable loading rate for 2-Methylnaphthalene and failed to

authorized per 56385, Special Condition 18.

Self Report?

Classification: Moderate

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Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Condition 27 OP

Description:

Failure to maintain allowable emissions rates.

Self Report? Citation:

Classification: Moderate

Classification: Moderate

Moderate

Moderate

Minor

Classification:

Classification:

Classification:

30 TAC Chapter 115, SubChapter B 115.114(a)(4) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Special Condition 1A OP

Description:

Failure to perform visual tank inspections.

Self Report? NO Citation:

30 TAC Chapter 115, SubChapter B 115,114(a)(1)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)

Special Condition 1A OP

Description:

Failure to perform visual tank inspections.

Self Report? Citation:

NO

30 TAC Chapter 116, SubChapter B 116.110(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Terms and Conditions OP

Description:

Failure to obtain permit authorization for 4 tanks.

Self Report? Citation:

NO

30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122,143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.695(a)(3)(ii)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(d)

5C THSC Chapter 382 382.085(b) Special Condition 13 PERMIT Special Condition 14 PERMIT

Special Condition 27 OP

Description:

Failure to replace immediately with fresh carbon when carbon breakthrough was

indicated by monitoring.

Self Report? Citation:

NO 30 TAC Chapter 101, SubChapter A 101.20(1)

30 TAC Chapter 113, SubChapter C 113,130 30 TAC Chapter 113, SubChapter C 113,340 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(2) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THSC Chapter 382 382.085(b)

Special Condition 1A OP

Description:

Failure to operate without a cap, blind flange, pug, or a second valve installed on

equipment in VOC service.

Self Report? Citation:

NO

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT Special Condition 27 OP

Description:

Failure to maintain allowable emissions rates.

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 10 PERMIT Special Condition 11 PERMIT Special Condition 27 OP

Classification: Moderate

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Description:

Failure to maintain allowable throughput rates. EIC B18 Repeat and Rolled in.

MOD (2)(D)

Date: 04/03/2009

(735828)

CN600582399

Classification:

Classification:

Moderate

Moderate

Moderate

Citation:

Self Report? NO

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(C)

5C THSC Chapter 382 382.085(b)

Description:

Failure to submit a Semiannual Deviation Report (SDR) no later than 30 days after

the end of the reporting period.

Self Report?

Citation:

NO

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 14 OP Special Condition 6 PERMIT

Description:

Failure to perform visual tank inspections.

Self Report? Citation:

NO

Classification: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382,085(b) Special Condition 1 PERMIT Special Condition 14 OP

Description:

Failure to maintain allowable emissions rates.

Self Report? NO

30 TAC Chapter 101, SubChapter A 101.20(1)

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.340 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122,143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(2) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THSC Chapter 382 382,085(b)

Special Condition 14 OP Special Condition 7E PERMIT

Description:

Failure to operate without a cap, blind flange, pug, or a second valve installed on

equipment in VOC service.

Self Report? Citation:

NO Classification: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Condition 12 PERMIT Special Condition 14 OP

Description:

Failure to maintain allowable emissions rates and Heat Specific Factors.

(768293)

Date: 04/30/2009 Self Report? YES

Classification:

Moderate

Moderate

Citation:

2D TWC Chapter 26, SubChapter A 26.121(a)

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 06/18/2009

(745434)

Self Report?

Classification:

Citation:

30 TAC Chapter 113, SubChapter C 113,340

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(3) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT T 63.464(a)

5C THSC Chapter 382 382.085(b)

Special Condition 1A OP

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Description: Failure to properly operate Tank 907, an external floating roof storage vessel.

Date: 08/26/2009 (761200)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT Special Condition 26 OP

Description: Failure to maintain allowable emissions rates.

Self Report? NO
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT Special Condition 26 OP Special Condition 3 PERMIT

Description: Failure to maintain allowable emissions rates and concentrations.

Self Report? NO Classification: Moderate

Classification:

Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT Special Condition 26 OP

Description: Failure to maintain allowable emissions rates.

Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116,115(b)

Ditation: 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT Special Condition 2 PERMIT Special Condition 26 OP

Description: Failure to maintain allowable emissions rates and concentrations.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 1 PERMIT Special Condition 1 PERMIT Special Condition 26 OP

Description: Failure to maintain allowable emissions rates and firing rates.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Condition 26 OP

Description: Failure to maintain allowable emissions rates.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 8 PERMIT Special Condition 26 OP

Special Condition 8 PERMIT

Description:

Citation:

Failure to maintain allowable emissions rates and concentrations. EIC B14

MOD(2)(D)

Self Report?

NO

Classification: Moderate

Classification:

Moderate

Moderate

Classification: Minor

Classification: Minor

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116,115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122,143(4) 5C THSC Chapter 382 382.085(b)

General Condition 8 PERMIT Permit By Rule (PBR) project 51314 PERMIT

Special Condition 26 OP Special Condition 4 PERMIT

Description:

Failure to maintain allowable emissions rates and firing rates.

Self Report?

Citation:

30 TAC Chapter 101, SubChapter A 101.20(1)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(e)(4)(i)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Condition 26 OP Special Condition 3 PERMIT

Description:

Failure to maintain allowable emissions rates and concentrations.

Self Report? Citation:

Classification:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 26 OP Special Condition 5 PERMIT

Description:

Failure to maintain minimum flame temperature of 2200 degrees Fahrenheit for

more than 168 hours in four consecutive calendar quarters for SRU-1.

Self Report?

NO Citation:

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 13B PERMIT Special Condition 26 OP

Description:

Failure to maintain operation parameters of scrubber venture pressure drop as

established in the last satisfactory stack test.

Self Report? Citation:

NO

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT UU 60.472(c)

5C THSC Chapter 382 382.085(b) Special Condition 2 PERMIT Special Condition 26 OP

Description:

Citation:

Failure to comply with an opacity limitation.

Self Report?

NO

30 TAC Chapter 113, SubChapter C 113,340 30 TAC Chapter 115, SubChapter D 115.352(2) 30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(d)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

5C THSC Chapter 382 382,085(b) Special Condition 1 PERMIT Special Condition 1D OP Special Condition 26 OP Special Condition 5(I) PERMIT

Description:

Failure to repair a leaking fugitive component within 15 days of detection.

Self Report?

Citation:

30 TAC Chapter 113, SubChapter C 113.340

30 TAC Chapter 115, SubChapter D 115.352(4)

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30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(2) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THSC Chapter 382 382.085(b)

Special Condition 1D OP

Description:

Failure to operate without a cap, blind flange, pug, or a second valve installed on

Classification:

Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Minor

equipment in VOC service.

Self Report? Citation:

NO

30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 16 C PERMIT Special Condition 26 OP

Description:

Failed to maintain allowable loading rate for Benzene.

Citation:

Self Report? NO

30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382,085(b) Special Condition 26 OP Special Condition 5 PERMIT

Description:

Failure to collect loading vapors from atmospheric tank truck loading facility.

Self Report? Citation:

NO Classification: Moderate 30 TAC Chapter 116, SubChapter B 116,110(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Special Condition 26 OP

Description:

Failure to authorize the Off Gas Treater (OGT) Cooling Tower for its current

service.

NO

Self Report?

NO Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 26 OP Special Condition 4C PERMIT

Description:

Failure to Monitor and record stack exhaust temperature.

Self Report? Citation:

30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122,143(4) 5C THSC Chapter 382 382.085(b)

Permits 9195A, 16840, and 43109 PERMIT

Special Condition 26 OP

Description:

Failure to perform Cylinder Gas Audits (CGAs) during the third quarter of 2008 on the Continuious Emissions Monitoring Systems (CEMS) of EPNs 15SRUINCIN.

60COGENSTK, and 61BLRSTCK.

Date: 12/23/2009

(782403)

CN600582399

Self Report? NO Citation:

Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382,085(b) Permit by Rule (PBR) 74442 PERMIT

Special Condition 1 PERMIT Special Condition 12 PERMIT Special Condition 14 ORDER

Description:

Failure to maintain allowable emissions rates and Heat Specific Factors.

Date: 12/31/2009

(761853)

Self Report? NO

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

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5C THSC Chapter 382 382.085(b) Special Condition 10 PERMIT Special Condition 11 PERMIT Special Condition 27 OP

Description:

Failure to maintain allowable throughput rates. EIC B18 Repeat and Rolled in.

MOD (2)(D)

Date: 01/31/2010

(804454)

CN600582399

Self Report? YES

2D TWC Chapter 26, SubChapter A 26.121(a)

Classification:

Classification: Minor

Classification:

Classification:

Classification:

Classification: Moderate

Moderate

Moderate

Moderate

Moderate

Citation:

30 TAC Chapter 305, SubChapter F 305,125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 03/19/2010

(792686)

CN600582399

Self Report? NO Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(2) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) General Condition 9 PERMIT Special Condition 28 OP Special Condition 2F OP

Description:

Citation:

Failure to properly report emission events. EIC C3

Date: 03/31/2010

(830808)

Self Report? YES

2D TWC Chapter 26, SubChapter A 26.121(a)

30 TAC Chapter 305, SubChapter F 305,125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 04/30/2010 Self Report? YES

(830809)

2D TWC Chapter 26, SubChapter A 26.121(a)

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 07/26/2010

(789923)

CN600582399

Self Report? NO

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)

Special Condition 13 PERMIT Special Condition 26 OP Special Condition 9 PERMIT

Description:

Failure to maintain Venturi pressure drop above the 3 hour rolling average limit

and the hourly average limit. EIC B19g.(1) MOD (2)(G)

Self Report? NO

Citation:

Classification: Moderate 30 TAC Chapter 101, SubChapter A 101,20(1)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)

5C THSC Chapter 382 382.085(b)

Special Condition 26 OP Various Permits PERMIT

Description:

Failure to maintain the content of H2S below 0.1 grains per dry standard cubic

foot (gr/dscf). EIC B18 MOD(2)(D)

Self Report? NO

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 26 OP Special Condition 3 PERMIT



Description:

Failure to maintain allowable emissions rates and concentrations. EIC B14

MOD(2)(D)

Citation:

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116,115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter B 116,116(a)(1) 30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382,085(b) General Condition 1 PERMIT Special Condition 1 PERMIT Special Condition 26 OP

Description:

Failure to maintain allowable emissions rates and firing rates. EIC B14 MOD(2)(D)

Self Report?

NO

Classification: Minor

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101,20(1) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13(d)

5C THSC Chapter 382 382.085(b) Special Condition 26 OP Special Condition 7B PERMIT

Description:

Failure to perform daily calibarations on a Continuous Emissions Monitoring

System (CEMS) at EPN 60COGENSTK. EIC C1 MIN (3)(A)

Self Report?

NO

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101,20(1) 30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a)

5C THSC Chapter 382 382,085(b) Special Condition 26 OP Special Condition 3 PERMIT

Description:

Failure to monitor a Delay of Repair (DOR) Leak Detection and Repair (LDAR)

component to verify a repair within 15 days of the unit being returned to service.

EIC B18 MOD (2)(D)

Self Report? NO

NO

Classification:

Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(1)

30 TAC Chapter 113, SubChapter C 113,340 30 TAC Chapter 115, SubChapter D 115,352(2) 30 TAC Chapter 122, SubChapter B 122,143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a) 5C THSC Chapter 382 382,085(b)

Special Condition 1A OP

Description:

Failure to repair a leaking fugitive component within 15 days of detection. EIC

B18 MOD (2)(D)

Self Report?

Classification:

Minor

Citation:

30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 113, SubChapter C 113.130 30 TAC Chapter 113, SubChapter C 113.340 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THSC Chapter 382 382.085(b)

Special Condition 1A OP Special Condition 26 OP Special Condition 5 PERMIT Various Permits PERMIT

Description:

Failure to operate without a cap, blind flange, pug, or a second valve installed on

equipment in VOC service. EIC C10 MIN (3)(D)

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

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30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT Special Condition 27 OP

Description:

Failure to maintain allowable emissions rates and firing rates. EIC B14 MOD(2)(D)

Self Report?

NO

Classification: Minor

Citation:

30 TAC Chapter 122, SubChapter B 122,143(4)

30 TAC Chapter 122, SubChapter B 122.145(1)(C) 5C THSC Chapter 382 382.085(b)

Description:

Failure to submit of the quarterly report required by 40 CFR 61, Subpart BB, for the period of July 1, 2009, through September 30, 2009, in a timely manner. EIC

C3 MIN (3)(C)

F. Environmental audits.

11/14/2008

(721343)

Notice of Intent Date:

No DOV Associated

02/13/2009

(740077)

Notice of Intent Date:

Disclosure Date:

08/14/2009

Viol. Classification: Moderate

Citation:

40 CFR Part 61, Subpart FF 61.355(c)(3)

Description: Failure to collect a minimum of three representative samples form each waste stream.

09/08/2009

(776664)

Notice of Intent Date:

No DOV Associated

G. Type of environmental management systems (EMSs).

N/A

Η. Voluntary on-site compliance assessment dates.

Participation in a voluntary pollution reduction program. Ι.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

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# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TIESTA O CONTRATOCIONI ONI
TOTAL PETROCHEMICALS USA,	§	TEXAS COMMISSION ON
INC.	§	
RN102457520	§	ENVIRONMENTAL QUALITY

## AGREED ORDER DOCKET NO. 2010-1300-AIR-E

#### I. JURISDICTION AND STIPULATIONS

At its \_\_\_\_\_\_ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding TOTAL PETROCHEMICALS USA, INC. ("the Respondent") under the authority of Tex. Health & Safety Code ch. 382 and Tex. Water Code ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent appear before the Commission and together stipulate that:

- 1. The Respondent owns and operates a petrochemical plant at 7600 32nd Street in Port Arthur, Jefferson County, Texas (the "Plant").
- 2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
- 3. The Commission and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
- 4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about July 31, 2010 and August 11, 2010.
- 5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

- 6. An administrative penalty in the amount of Two Hundred Thirteen Thousand Nine Hundred Seventy-Two Dollars (\$213,972) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent has paid Eighty-Five Thousand Five Hundred Eighty-Nine Dollars (\$85,589) of the administrative penalty and Forty-Two Thousand Seven Hundred Ninety-Four Dollars (\$42,794) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty. Eighty-Five Thousand Five Hundred Eighty-Nine Dollars (\$85,589) shall be conditionally offset by the Respondent's completion of a Supplemental Environmental Project ("SEP").
- 7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 8. The Executive Director of the TCEQ and the Respondent have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
- 9. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:
  - a. Replaced a faulty combustible sensor, physically isolated purge gas, locked and tagged out the control valve, and trained personnel in the modification process flow to prevent exceedances of the permitted hourly emissions rates for carbon monoxide ("CO"), nitrogen oxide ("NOx"), and sulfur dioxide ("SO2") on February 5, 2010;
  - b. Modified operating instructions indicating proper control during periods of black burn in order to maintain the proper temperature at the chlorosorb inlet on June 17, 2010;
  - c. In response to Incident No. 139159, repaired the faulty flow meter and trained personnel on June 23, 2010;
  - d. Submitted an administratively complete permit application on August 2, 2010, to amend the current Air Permit Nos. 46396 and PSD-TX-1073, to incorporate Air Permit Nos. 5694A, 18936 and PSD-TX-762M2, 56386, and 56409, in order to raise the maximum allowable rates for volatile organic compounds ("VOCs"), authorize Tank 586 for its current service of Pyrolysis Fuel Oil/Pyrolysis Gas Oil, and raise the throughput rates at Docks 1 and 3;
  - e. Trained personnel on the environmental permit emissions rates and alarm points that operations use to prevent SO2 emissions rates exceedances at the heaters on September 2, 2010;
  - f. Trained personnel on environmental permit emissions rates at the Sulfur Recovery Unit Incinerator and alarm points that operations use to prevent CO,

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hydrogen sulfide ("H2S") and SO2 emissions rates exceedances on September 2, 2010;

- g. Created and modified alarm points to ensure a quicker response time for periods of elevated emissions rates for CO and NOx concentrations on September 8, 2010; and
- h. Revised operating procedures to emphasize the importance of managing CO burn at the Regenerator Flue Gas Post 2000 Post (8) on September 9, 2010.
- 10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
- 11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

#### II. ALLEGATIONS

As owner and operator of the Plant, the Respondent is alleged to have:

1. Failed to comply with the allowable hourly emissions rates, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(b), (b)(2)(F) and (c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), Federal Operating Permit ("FOP") O-01267, Special Terms and Conditions ("STC") 28, Air Permit Nos. 2347, 8983A, 9194A and PSD-TX-453M6, 9195A and PSD-TX-453M6, SC 1, Air Permit Nos. 3615 and 5694, General Conditions ("GC") 8, and Air Permit Nos. 9193A and PSD-TX-453M6, Special Conditions ("SC") 2, as documented during an investigation conducted on June 14, 2010. Specifically, from January 1, 2009 through December 31, 2009, the Respondent exceeded the authorized hourly emissions rates for 12 heaters, resulting in the release of 70.6 pounds ("lbs") of SO2, as shown below.

	SO2 Emissions January 1, 2009 to December 31, 2009										
EPN	Permit No.	MAERT (lbs/hr)	Event 2 (hrs)	Event 3 (hrs)	Avg (lbs/hr)	Max (lbs/hr)	TUA (lbs)				
01ACU1H101	9194A and PSD-TX- 453M6	3.90	0	1	4.61	4.61	0.71				
01VACTH301	9194A and PSD-TX- 453M6	2.82	0	1	3.31	3.31	0.49				
01ACU1202A	3615	4.94	0	1	5.70	5.70	0.80				

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01ACU1202B	3615	4.94	0	1	5.87	5.87	0.93
10DEMEXH4	8983A	2.15	0	1	3.01	3.01	0.86
10DEMEXH2	8983A	1.83	0	1	3.20	3.20	1.37
17NHTHTRS	5694A	3.32	1	1	4.14	4.52	1.63
17REFHTRS	5694A	11.13	12	1	13.54	19.42	26.54
10DEMEXH4	8983A	2.15	0	2	2.23	2.29	0.16
10DEMEXH2	8983A	1.83	0	2	2.04	2.07	0.41
13UNIBH301	9193A and PSD-TX- 453M6	2.64	0	1	2.75	2.75	0.11
15SRUINCIN	9195A and PSD-TX- 453M6	37.80	0	2	43.71	45.88	11.81
17REFHTRS	5694A	11.13	0	2	12.74	12.88	3.21
o1VACTH301	9194A and PSD-TX- 453M6	2.82	0	2	3.58	3.90	1.52
01ACU1202A	3615	4.94	0	2	5.92	6.41	1.96
01ACU1202B	3615	4.94	0	2	5.79	6.27	1.70
04BTXH-52	5694A	1.32	1	2	1.52	1.69	0.60
10DEMEXH4	8983A	2.15	3	1	2.46	3.04	1.67
10DEMEXH2	8983A	1.83	3	0	2.19	2.64	1.53
17NHTHTRS	5694A	3.32	1	2	4.07	4.50	2.25
17REFHTRS	5694A	11.13	1	2	14.55	15.97	10.26
52DHT2H-2 A/B	2347	1.74	0	1	1.82	1.82	0.08

EPN= emissions point number
MAERT= maximum allowable emissions rate table
Max= maximum
hrs – hours

lbs/hr= pounds per hour Avg= average TUA= total unauthorized amount

- 2. Failed to comply with the allowable hourly emissions rates, in violation of 30 Tex. Admin. Code §§ 116.115(b), (b)(2)(F) and (c), 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, Air Permit No. 5694A, GC 8, as documented during an investigation conducted on June 14, 2010. Specifically, from January 29, 2009 to March 10, 2009, on July 7, 2009 and on November 3, 2009, the Respondent exceeded the authorized hourly emissions rates at EPN 17REFHTRS of 15.75 lbs/hr for CO and 14.85 lbs/hr for NOx, resulting in the release of 588.45 lbs of CO and 2.16 lbs of NOx.
- 3. Failed to comply with the allowable hourly emissions rates and concentrations, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b), (b)(2)(F) and (c), 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, and Air Permit Nos. 16840 and PSD-TX-688M2, SC 2 and GC 8, as documented during an investigation conducted on June 14, 2010. Specifically, the Respondent exceeded the authorized hourly emission rate of 77.26 lbs/hr of CO and the NOx concentrations of 42 parts per million ("ppm") at EPN 60COGENSTK on January 28, 2009, February 6, 2009, August

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- 12, 2009 through August 17, 2009, December 7, 15 and 16, 2009, resulting in the release of 182.77 lbs of CO and the average concentration of 88.70 ppm of NOx.
- 4. Failed to comply with the allowable hourly emissions rates, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(F) and (c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, and Air Permit No. 56385, SC 1, as documented during an investigation conducted on June 14, 2010. Specifically, on February 5 and 16, 2009, during daily monitoring of the carbon canister breakthrough the Respondent exceeded the authorized hourly emissions rate of 0.01 lbs/hr of VOCs at EPN 67TNK0660CC resulting in the release of 0.96 lbs of VOCs for 48 hours.
- 5. Failed to comply with the allowable hourly emissions rates and concentrations, in violation of 30 Tex. Admin. Code §§ 101.20(1) and (3), 116.115(b)(2)(F) and (c), and 122.143(4), 40 Code of Federal Regulations ("CFR") § 60.104(a)(2)(i) and 60.105(e)(4)(i), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, Air Permit Nos. 9195A and PSD-TX-453M6, SC 1 and 3, as documented during an investigation conducted on June 14, 2010. Specifically, on May 9, 2009 to November 20, 2009, the Respondent exceeded the hourly emissions rate of 40.37 lbs/hr of CO, 1.06 lbs/hr of H2S, and 37.88 lbs/hr of SO2 at the Sulfur Recovery Tail Gas Thermal Oxidizer, EPN 15RUINCIN, resulting in the release of 254.1 lbs of CO, 2.39 lbs of H2S, 87.5 lbs of SO2, and the average SO2 concentration of 602 ppm.
- 6. Failed to comply with the allowable hourly emissions rates and concentrations, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(b), (b)(2)(F) and (c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, and Air Permit Nos. 18936 and PSD-TX-762M3, SC 8, as documented during an investigation conducted on June 14, 2010. Specifically, on July 8, 2009 and December 8, 2009, the Respondent exceeded the authorized hourly emission rate of 143.69 lbs/hr of CO and CO concentration of 500 ppm at the Regenerator Flue Gas Post 2000 Project (8), EPN 55RGNFLUGS, resulting in the release of 219.72 lbs of CO and the average CO concentration of 619.9 ppm.
- 7. Failed to maintain the proper temperature at the chlorosorb inlet, in violation of 30 Tex. ADMIN. CODE §§ 113.780, 116.115(c), and 122.143(4), 40 CFR § 63.1567(a)(2), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP O-01267, STC 28, and Air Permit No. 5694A, SC 3, as documented during an investigation conducted on June 14, 2010. Specifically, the maximum temperature of 366.6 degrees Fahrenheit was exceeded in the chlorosorb inlet by 4.05 degrees Fahrenheit on September 15, 2009, and 1.72 degrees Fahrenheit on September 13, 2009.
- 8. Failed to comply with the annual allowable emission rates, in violation of 30 Tex. Admin. Code §§ 106.6, 116.115(b) and (b)(2)(F), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, Air Permit Nos. 5694A and 18936 and PSD-TX-762M2, GC 8, Air Permit Nos. 46396 and PSD-TX-1073, 56385, and 56409, SC 1, as documented during an investigation conducted on June 14, 2010. Specifically, from January 1, 2008 to December 31, 2008, the Respondent exceeded the authorized annual VOC emissions rate by a total of 9.2 tons per year ("tpy") for 14 tanks. From January 1, 2009 through December 31, 2009, the Respondent exceeded the authorized annual VOC emissions rate by a total of 11.1 tpy for 14 tanks, as shown below.

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VOC MAERT tpy limits at 14 Tanks January 1, 2008, to December 31, 2008						
EPN	Permit No. Or Permit by Rule No.	MAERT (tpy)	2008 Emissions (tpy)			
04TANK0941	5694A	0.30	0.4293			
04TANK0946	5694A	0.39	0.5079			
22TANK0502	56409	2.73	3.44			
22TANK0503	56386	0.05	0.5185			
22TANK0525	46396	0.72	0.7644			
22TANK0588	46396	0.18	0.4134			
22TANK0910	46396	0.72	3.0037			
22TANK0939	46396	3.27	3.3778			
45TANK0474	56386	0.06	0.9554			
67TANK0504	56386	0.03	0.3807			
67TANK0505	56386	0.05	2.4774			
67TANK0595	56386	0.02	0.4183			
67TANK0596	56386	0.02	0.6412			
67TANK0905	56386	0.01	0.4421			

VOC = volatile organic compound MAERT = Maximum Allowable Emissions Rate Table tpy = tons per year EPN = Emissions point number

VOC MAERT tpy limits at 14 Tanks						
January 1, 2009, to December 31, 2009						
EPN	Permit No. Or Permit	MAERT	2009 Emissions			
	by Rule No.	(tpy)	(tpy)			
04TANK0941	5694A	0.03	0.5210			
04TANK0946	5694A	0.39	0.36557			
22TANK0502	46396	2.73	3.3168			
22TANK0503	56386	0.05	1.0674			
22TANK0522	46396	0.28	0.4442			
22TANK0586	46396	0.63	0.6398			
22TANK0919	46396	0.92	2.4891			
22TANK0920	46396	0.85	1.8569			
67TANK0505	56386	0.05	3.3159			
22TANK0545	46396	0.40	1.8983			
22TANK0563	18936 and PSD-TX-	3.21	3.5029			
	762M2					
22TANK0572	46396	0.32	0.3854			
22TANK0902	46396	2.90	4.0184			
22TK926FLR	46396	0.01	0.0141			

9. Failed to authorize Tank 586, EPN 22TANK0586, for current service, in violation of 30 Tex. Admin. Code §§ 116.110(a), 116.115(c) and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28 and Air Permit No. 49743, SC 4, as documented during an investigation conducted on June 14, 2010. Specifically, for the period of July 1, 2009 through September 30, 2009, Tank 586 was authorized for Asphalt/Asphalt

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TOTAL PETROCHEMICALS USA, INC. DOCKET NO. 2010-1300-AIR-E Page 7

Blendstock, but not authorized for its current service of Pyrolysis Fuel Oil/Pyrolysis Gas Oil.

- Failed to load within the allowable annual throughput rates at Dock Nos. 1 and 3, in violation of 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, STC 28, and Air Permit Nos. 46396 and PSD-TX-1073, SC 18 and 19, (previously SC 10), as documented during an investigation conducted on June 14, 2010. Specifically, the Respondent exceeded the annual throughput rates in 2006 by 36%, in 2007 by 44%, and in 2008 by 46%.
- Failed to prevent unauthorized emissions on May 1, 2010, in violation of 30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP O-01267, SC 28, and Air Permit No. 54026, SC 1, as documented during an investigation conducted on May 27, 2010. Specifically, Incident No. 139159, resulted from the Respondent failing to close the nitrogen purge valves at the start-up of compressor C-200A. Since the gas flow meter was faulty and did not register any excess flow, the North and South Flares released a total of 9.04 lbs of H2S and 1,711.50 of SO2 for four hours and four minutes. Since this emissions event could have been prevented by better operational and/or maintenance practices, the demonstrations in 30 Tex. Admin. Code § 101.222 necessary to present an affirmative defense were not met.

#### III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: TOTAL PETROCHEMICALS USA, INC., Docket No. 2010-1300-AIR-E" to:

Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

2. The Respondent shall implement and complete a SEP in accordance with Tex. Water Code § 7.067. As set forth in Section I, Paragraph 6 above, Eighty-Five Thousand Five Hundred Eighty-Nine Dollars (\$85,589) of the assessed administrative penalty shall be offset with the condition that the Respondent implement the SEP defined in Attachment A, incorporated herein by reference. The Respondent's obligation to pay the

conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.

- 3. It is further ordered that the Respondent shall undertake the following technical requirements:
  - a. Within 30 days after the date of this Agreed Order, initiate an engineering study to evaluate the carbon canister system operation, and implement measures designed to control VOC hourly and annual emissions rates exceedances;
  - b. Within 45 days after the effective date of this Agreed Order, submit certification of compliance for Ordering Provision No. 3.a., as described in Ordering Provision No. 3.d.;
  - c. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the permit application for Air Permit Nos. 46396 and PSD-TX-1073within 30 days after the date of such requests, or by other deadline specified in writing; and
  - d. Within 180 days after the effective date of this Agreed Order, submit written certification that either proper authorization has been obtained and the changes are sufficient to demonstrate compliance with the violations addressed or that operation has ceased until such time that appropriate authorization is obtained. The certification shall be notarized by a State of Texas Notary Public and include the following language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Air Section, Manager Beaumont Regional Office Texas Commission on Environmental Quality 3870 Eastex Freeway Beaumont, Texas 77703-1892

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- 4. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
- 5. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 6. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 7. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- This Agreed Order may be executed in separate and multiple counterparts, which 8. together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
- 9. Under 30 Tex. Admin. Code § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

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TOTAL PETROCHEMICALS USA, INC.

# SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	
For the Executive Director	5/27/2011
I, the undersigned, have read and understand the atta agree to the attached Agreed Order on behalf of the e do agree to the terms and conditions specified therein. accepting payment for the penalty amount, is materially	entity indicated below my signature, and I I further acknowledge that the TCEQ, in
<ul> <li>I also understand that failure to comply with the Ordand/or failure to timely pay the penalty amount, may remark to a A negative impact on compliance history;</li> <li>Greater scrutiny of any permit applications.</li> <li>Referral of this case to the Attorney General's Cadditional penalties, and/or attorney fees, or to</li> </ul>	esult in: s submitted; Office for contempt, injunctive relief,
• Increased penalties in any future enforcem	•
<ul> <li>Automatic referral to the Attorney General's C</li> <li>and</li> </ul>	Office of any future enforcement actions;
• TCEQ seeking other relief as authorized by	
In addition, any falsification of any compliance docume	ents may result in criminal prosecution.
Signature	24 January 2011  Date
Darrell Jacob	Refinery Manager
Name (Printed or typed) Authorized Representative of	Title

• Instructions: Send the original, signed

Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph i of this Agreed Order.

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# Attachment A Docket Number: 2010-1300-AIR-E

#### SUPPLEMENTAL ENVIRONMENTAL PROJECT

The Respondent:

TOTAL PETROCHEMICALS USA, INC.

**Penalty Amount:** 

One Hundred Seventy-One Thousand One Hundred

Seventy-Eight Dollars (\$171,178)

**SEP Offset Amount:** 

Eighty-Five Thousand Five Hundred Eighty-Nine

Dollars (\$85,589)

Type of SEP:

Pre-approved SEP

Third-Party Recipient:

Southeast Texas Regional Planning Commission

**Project Name:** 

Meteorological and Air Monitoring Network

Location of SEP:

**Jefferson County** 

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative penalty amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP offset amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

# 1. Project Description

## a. Project

The Respondent shall contribute the SEP offset amount to the Third-Party Recipient named above. The contribution will be to the **Southeast Texas Regional Planning Commission** to be used for the *Meteorological and Air Monitoring Network* as set forth in an agreement between the Third-Party Recipient and the TCEQ. Specifically, the contribution will be used to operate, maintain, and potentially expand the existing Southeast Texas Regional Air Monitoring Network which includes nine monitoring stations currently at the following locations:

- 1. Beaumont CAM#2
- 2. Cove School CAM #C695
- 3. Mauriceville CAM#642
- 4. Port Arthur (Motiva) Industrial Site CAM #C628
- 5. Port Arthur Memorial High School campus CAM #C689
- 6. Port Neches CAM #136
- 7. Sabine Pass CAM #C640
- 8. Southeast Texas Regional Airport CAM #C643
- 9. West Orange CAM #C9

The pollutants currently monitored at each station are identified in Table 1.1 of the agreement between the Third-Party Recipient and the TCEQ. Additional parameters or monitoring sites may, contingent upon available funding and approval of TCEQ, be

Page 1 of 4

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added. Operation and maintenance of the ambient air monitoring stations includes canister sampling and gas chromatographs. Ancillary equipment includes sample conditioning systems, meteorological towers, climate controlled equipment shelters, a remote communications system, and electronic data logging capability. Ambient monitoring protocols have been and will continue to conform to applicable TCEQ or U.S. Environmental Protection Agency guidelines.

A TCEQ-approved Quality Assurance Project Plan containing all applicable EPA QAR5 elements shall be maintained. Analysis of all data collected from these sites will comply with Standard Operating Procedures for the analysis and measurement of Volatile Organic Compounds in Ambient Air. The laboratory data generated by this project will be from a TCEQ accredited laboratory in compliance with state laws and rules regarding use of certified or accredited testing laboratories. For example, the Third-Party Recipient must comply with 30 Texas Administrative Code, Chapter 25, Subchapter A, relating to Environmental Testing Laboratory Accreditation and Certification, as amended.

The SEP Offset Amount will be used to purchase equipment (such as automated canister samplers), hardware, software, and licenses to enable the monitoring, and for the cost of operating, maintaining, and periodically upgrading or adding to these air monitoring stations along with ancillary equipment approved by TCEQ. The data will be validated and sent to TCEQ's Leading Environmental Analysis and Display (LEADS) system. All costs associated with the collection, transfer, and formatting of these data to be compatible with the LEADS system is the responsibility of the Third-Party Recipient. No portion of the SEP Offset Amount will be used for administrative costs or salaries of the Third-Party Recipient. The Third-Party Recipient may use contractors to perform the monitoring project, subject to special conditions concerning costs.

The project will be administered in accordance with federal, state, and local environmental laws and regulations. The Respondent certifies that there is no prior commitment to make this contribution and that it is being performed solely in an effort to settle this enforcement action.

# b. Environmental Benefit

Particulate matter (PM), sulfides (SO, SO2), oxides of nitrogen (NOx), volatile organic carbon (VOC) compounds, and ambient air conditions are measured at the stations and the data are made accessible to TCEQ and the public. Sites may also provide continuous assessment of benzene, 1, 3-butadiene and styrene. This monitoring was not previously covered by existing ambient air monitoring systems. The data is shared with the Texas Commission on Environmental Quality, industry, and the public at <a href="http://www.tceq.state.tx.us/cgi-bin/compliance/monops/site">http://www.tceq.state.tx.us/cgi-bin/compliance/monops/site</a> info.pl.

Continued monitoring in this area of the community will help better understand air quality pollutants and will enable better identification of emission sources. The data will focus on specific chemicals that may raise air quality concerns.

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# c. Minimum Expenditure

The Respondent shall contribute at least the SEP offset amount to the Third-Party Recipient and comply with all other provisions of this SEP.

#### 2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent shall contribute the SEP offset amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

Southeast Texas Regional Planning Commission Bob Dickinson, Director Transportation and Environmental Resources Attention: SEP South East Texas Regional Planning Commission 2210 Eastex Freeway, Beaumont, TX 77703

# 3. Records and Reporting

Concurrent with the payment of the SEP offset amount, the Respondent shall provide the Enforcement Division SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP offset amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division Attention: SEP Coordinator, MC 219 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

# 4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP offset amount.

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TOTAL PETROCHEMICALS USA, INC. Agreed Order – Attachment A

In the event of incomplete performance, the Respondent shall submit a check for any remaining amount due made payable to "Texas Commission on Environmental Quality" with the notation "SEP Refund" and the docket number of the case, and shall send it to:

Litigation Division Attention: SEP Coordinator, MC 175 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

# 5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

# 6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

## 7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

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